



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

**Quality Assurance and Compliance
Onsite Monitoring Visit
for
Career and Technical Education**

Lake Wales Charter School

November 21-22, 2019

Final Report

TABLE OF CONTENTS

I. Introduction 1

II. Authority 1

III. Quality Assurance Policies, Procedures, and Protocols 1

IV. Provider Selection 1

V. Lake Wales Charter School..... 2

VI. Monitoring Activities 3

VII. Results 3

VIII. Required Resolution Activities 7

IX. Summary 7

 Appendix A 9

 Appendix B 10

Florida Department of Education
Division of Career and Adult Education

**Lake Wales Charter School
Career and Technical Education
Quality Assurance and Compliance Monitoring Report**

I. INTRODUCTION

The Florida Department of Education (FDOE), Division of Career and Adult Education (division), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The Quality Assurance and Compliance (QAC) section is responsible for the design, development, implementation and evaluation of a comprehensive system of quality assurance including monitoring. The role of the quality assurance system is to assure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is incumbent upon the division to monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

The FDOE receives federal funding from the U.S. Department of Education (USDOE) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Strengthening Career and Technical Education for the 21st Century Act, and for Adult Education (AE) under the Workforce Innovation and Opportunity Act (WIOA) of 2014. FDOE awards sub-grants to eligible providers to administer local programs. FDOE 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 (EDGAR) and the Uniform Grant Guidance (UGG) 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).

Additional citations noting pertinent laws and regulations and authority to monitor are located in the 2019-2020 Quality Assurance Policies, Procedures and Protocols, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES AND PROTOCOLS

The Quality Assurance Policies, Procedures and Protocols manual was revised in the 2019-20 program year. The manual is provided to each provider prior to the monitoring visit. The manual provides a summary of each facet of the monitoring design and the process. It also contains protocols that may be used as agencies are monitored or reviewed. References may be made to the manual in this document; 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 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 section 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 monitoring strategy for Lake Wales Charter School (LWCS) was determined to be an onsite visit. Notification was sent to Dr. Jesse Jackson, superintendent, Lake Wales Charter School on August 7, 2019. The designated representative for the agency was Ms. Anna Barcenas, assistant principal of curriculum.

The onsite visit to the agency was conducted November 21-22, 2019. The two representatives of the division present during the visit were program specialists, Mrs. Christine Walsh and Mr. Michael Swift of the Quality Assurance and Compliance section.

V. LAKE WALES CHARTER SCHOOL

ENROLLMENT:

Fiscal Year (FY) 2017-18

CTE (possible duplication at program level): Secondary - 947

The provider was awarded the following grants for FY’s 2017-18, 2018-19 and 2019-20:

Finance

FY 2017-18

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Secondary	53D-1618A-8CS01	\$ 32,294.00	\$ 0.00

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Secondary	53D-1619B-9CS01	\$ 62,353.00	\$ 5,875.85

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins CTE Secondary	53D-1610B-0CS01	\$ 65,722.00	\$ N/A

*FY 2019-20 final project disbursement reports will not be available until the end of the program year

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

<https://lwcharterschools.com/>

VI. MONITORING ACTIVITIES

The monitoring activities included pre and post visit planning, an entrance and exit conference, records review, inventory review and interviews with administrators.

Onsite Visits

Members of the team made onsite visits to the following locations:

- Lake Wales High School

Entrance and Exit Conferences

The entrance conference for LWCS was conducted on November 21, 2019. The exit conference was conducted on November 22, 2019. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Alricky Smith	Chief Financial Officer	X	
Anna Barcenas	Assistant Principal of Curriculum, CTE Director	X	X
Jamie Ramos	Financial Secretary	X	X
Paige Turner	Teacher, Agriculture Education	X	
Lauren Crumbliss	Teacher, Culinary Arts Education	X	
Morgan Williams	Teacher, Agriculture Education	X	
Joe H. Hulett	Teacher, Health Science Education	X	
Mellisa Ard	Assistant Director, Finance	X	
Lisa Davis	Teacher, Early Childhood Education	X	
FDOE Monitoring Team			
Christine Walsh	Program Specialist, QAC, FDOE	X	X
Michael Swift	Program Specialist, QAC, FDOE	X	X

Interviews

Interviews were conducted with the administrative staff. All interviews were held during the course of the visit.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, item F. A minimum of 40 student records were reviewed. Policies and procedures were reviewed and discussed at various times during the visit.

VII. RESULTS

A. **ADMINISTRATION:** refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.

- At the program level each CTE academy instructor takes a hands-on approach in the management of their particular program area. The CTE instructors are involved with

operations such as program review and oversight; and program relationships with the local community.

- LWCS offers opportunities for professional development. There is an Instruction Coach on campus that oversees some of the Professional Development (PD) opportunities. CTE administrators, instructors and data staff participate in training as opportunity arises or as required by their program area. Beginning this school year the CTE instructors are included in the PD rotation with the regular subject area teachers.
- FDOE monitoring staff, the program director and school finance personnel discussed the importance of having completed policies and procedures and to make sure that all the required components are included in the policy or procedure.
- The school is actively performing outreach activities within the community to help increase the public awareness of the program offerings at the school.
- LWCS has recently fostered a new relationship with their local Chamber of Commerce and has met with the Chairman of the Economic Development Council. They anticipate input from both as they go through the new Comprehensive Local Needs Assessment (CLNA) process.
- There is a separation of duties between the administrative side of grant management and the programmatic side, but both sides work together cohesively to ensure that there is a continuous flow of information between the two.
- LWCS uses the Marzano Teacher Evaluation Model for formal and informal observations.

B. DATA AND ASSESSMENT: refers to all the components of the data and assessment system, including test administration, test security, data collection and entry and reporting, as well as procedures. The use of data in program decision-making is also explored and commented upon.

- All the student data for LWCS is collected at LWCS but processed and transmitted to FDOE by the Polk County School District (PCSD). Data is entered into the FOCUS® system daily.
- LWCS recently transitioned from a Genesis® system to the FOCUS® system. FOCUS® is now their integrated management information system (MIS). The FOCUS® system is provided to them through an agreement with the Polk County School District (PCSD). PCSD controls the level of access to the Focus® system. Currently the required data element for Single Parent, Single Pregnant is not afforded to them. They are working to resolve the issue.
- There is a multi-tiered review/verification process that takes place prior to submitting student data to FDOE. Data is reviewed by the CTE program teachers and the CTE director prior to sending it to the PCSD for transmission to FDOE. Upon the return of data reports from FDOE, they are reviewed by administration, shared with the CTE teacher, and if necessary, updated to correct any reporting errors.
- Student and program data is utilized for program management and improvement. These data reviews help gauge the likelihood of achieving grant requirements, offer insight into the success rates of teachers within the classroom and offer the school a chance to identify exemplary programs, as well as those that may be struggling.
- LWCS has staff with specific duties and responsibilities for data collection, entry and verification.
- The district does have policies and procedures for data collection, review and submission to FDOE.
- All student level data was made available to the FDOE monitoring staff while onsite.
- Upon review of student performance data, it was discovered that the school reported one student as earning an industry certification for EKG but could not provide evidence that the students passed the certification exam.

FINDING AND ACTION

- Finding B1: The provider failed to accurately report student data in FY 2017-18. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”
 - Required Action B1: LWCS shall submit a memo of attestation stating the school shall retain copy of all industry certifications earned (either a hard or electronic copy) and reported for verification purposes. Repayment for Career and Professional Education (CAPE) Industry Certifications to be determined by the Office of Budget and Assessment.

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

- The CTE academy programs are supported by advisory committees. These committees play a pivotal role in improving the quality of the CTE academy programs. The committees offer insight on current industry trends, current job outlooks and recommendation for industry specific equipment needs.
- The CTE department is working hard to recruit and retain teachers. The result of a current instructor unable to satisfy the required Perkins requirements has cost the school the opportunity to offer the program as a Perkins supported program.
- The school provides onsite opportunities for job training. They have an onsite day care that is staffed through the Early Childhood and Teacher Academy as well as a Doggie Day Care staffed by the Agriculture Academy for Veterinary Assisting.
- Beginning school year 2019-20 LWCS is offering a new program: Manufacturing Engineering. They have recruited a teacher and there has been a very positive response to the program.
- LWCS provides field trip opportunities for students to expand their insights in their career fields. Field trips have included: Lego Land, Polk State College, Johnson and Wales University Daytona State College and Warner University.
- The school conducts annual reviews to determine which programs are most beneficial to the students and school. At this time, decisions are made regarding expansion and/or termination of programs.

D. **TECHNOLOGY AND EQUIPMENT:** refers to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.

- LWCS uses a fixed asset system software called ADG® for inventory purposes. The system electronically tracks inventory from the time an item is approved for purchase all the way through its useful life.
- The school requires that any technology purchases require the approval of the district IT/Technology department.
- LWCS has a Property Custodian Manual which outlines in detail the requirements and procedures for inventory control.
- Equipment is inventoried annually and capitalized items over \$750 receive a numbered inventory identification tag. During the inventory review process, it was noted that the inventory system did not contain the required data Percent of Federal Participation.
- 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.

FINDING AND ACTION

- Finding D1: The provider failed to include all required data elements in their inventory system. This is in violation of UGG 2 CFR 200.313 Equipment.
 - Required Action D1: LWCS shall update their inventory system to include the missing data element: Percent of Federal Participation and submit to the FDOE monitor a copy of the updated inventory list.

- E. **ACCESS AND EQUITY:** refers to compliance with the requirements of federal non-discrimination laws as relating to recruitment, enrollment, participation and completion of programs.
 - The Office of Equal Educational Opportunity (OEEEO) is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEEO at 850-245-0511.

- F. **RECORDS REVIEW:** refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.
 - Sample advisory committee minutes, agendas and sign-in sheets
 - District procurement/purchasing records
 - Size, scope and quality checklist review
 - MIS data quality checklists
 - District policies and procedures for finance and procurement
 - LWCS data resource manual
 - Student and employee handbooks
 - Policies and procedures on inventory/equipment management
 - Student data records
 - Internal control policies
 - Policies on dual enrollment
 - Memorandums of Understanding (MOUs) and articulation agreements
 - Inventory records for all grant funded equipment purchases

- 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.
 - LWCS has financial policies and procedures in place to ensure the efficient cash management of Perkins grant funds.
 - Grant funded purchases must go thru an approval process prior to any grant funds being disbursed.
 - Academy instructors have P-cards to purchase classroom supplies. All P-card purchases are reviewed and approved prior to payment.
 - The finance department, CTE director and Network Manager represent the multiple tiers of checks and balances that a purchase must go through before it is approved.
 - Requests for purchases are shopped for best price prior to being approved or a Purchase Order (PO) being generated.
 - With their Enterprise Financial Software Management System® by American Data Group (ADG), directors will be able to access real time reports of all grant expenditures.

- LWCS does not have a procurement policy or manual as required by the state of Florida and the UGG. The policy manual is currently being drafted.

FINDING AND ACTION

- Finding G1: The provider does not have a written Procurement Policy as required. This is in violation of UGG 2 CFR 200.317 Procurements by States.
 - Required Action G1: LWCS shall develop and submit to the compliance monitor a locally approved Procurement Policy meeting the requirements set forth in the UGG 2 CFR 200.318 General procurement standards through §200.326 Contract provisions as specified in UGG 2 CFR 200.317 Procurements by states and State Statutes §287.001 Legislative intent, §287.017 Purchasing categories, threshold amounts, §287.057 Procurement of commodities or contractual services, §287.093 Minority business enterprises; procurement of personal property and services from funds set aside for such purpose and §838.22 Bid tampering.

H. COLLABORATION: refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency’s programs and students.

- LWCS has collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners include, but are not limited to:
 - Polk County Public Schools
 - Warner University
 - Polk State College
 - Lake Wales Fire Department
 - Ridge Veterinary Hospital
 - Thompson Veterinary Clinic
 - Grulke Fabrication
 - Petersen Industries
 - A Child’s Creative Learning Center

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Required Action Plan – LWCS is required to complete a CTE Corrective Action Plan.

IX. SUMMARY

Once the fieldwork 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 FDOE monitoring team lead. Once the final report is approved, it will be forwarded to the agency head with a copy to the provider 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 resolution 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 department, the monitoring team extends its appreciation to all participants in the LWCS onsite monitoring visit. Special thanks is offered to Ms. Anna Barcenas for her participation and leadership during this process.

APPENDIX A

Lake Wales Charter School
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: LAKE WALES CHARTER SCHOOL					
Program Type: CTE					
Target Year: 2017-2018					
Monitoring Year: 2019-2020					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	7	<u>X 10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	1	<u>X8</u>	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	1	<u>X 8</u>	8
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	0	<u>X 4</u>	0
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	0	<u>X 4</u>	0
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					86

Data sources used for calculations: Prior to July 1, 2018

APPENDIX B

Lake Wales Charter School
Required Action Plan

Finding	Required Action	Agency Response	Projected Date of Completion
<p>Finding B1: The provider failed to accurately report student data in FY 2017-18. This is in violation of UGG 2 CFR 200.328 “Monitoring and reporting program performance.”</p>	<p>Required Action B1: LWCS shall submit a memo of attestation stating the school shall retain copy of all industry certifications earned (either a hard or electronic) and reported for verification purposes. Repayment for CAPE Industry Certifications to be determined by the Office of Budget and Assessment.</p>	<p>A memo of attestation will be submitted as requested and LWCS will retain copies of all industry certifications earned (hard or electronic) for reporting and verification purposes.</p> <p>Repayment will be submitted as determined.</p> <p>Anna Barcenas will be responsible for submitting the necessary memo and ensure copies of industry certifications are retained.</p> <p>Anna Barcenas, Jamie Ramos (finance secretary) will work with the Office of Budget and Assessment as needed for repayment.</p>	<p>Memo shall be submitted by January 31, 2020.</p> <p>Repayment will be submitted in a timely manner once final amount is determined by the Office of Budget and Assessment.</p>
<p>Finding D1: The provider failed to include all required data elements in their inventory system. This is in violation of UGG 2 CFR 200.313 Equipment.</p>	<p>Required Action D1: LWCS shall update their inventory system to include the missing data element: Percent of Federal Participation and submit to the FDOE monitor a copy of the updated inventory list. Completed while on site. No further action required.</p>		
<p>Finding G1: The provider does not have a written Procurement Policy as required. This is in violation of UGG 2 CFR 200.317 Procurements by States.</p>	<p>Required Action G1: LWCS shall develop and submit to the compliance monitor a locally approved Procurement Policy meeting the requirements set forth in the UGG 2CFR 200.318 General procurement standards through §200.326 Contract provisions as specified in UGG 2 CFR 200.317 Procurements by states and State Statutes §287.001 Legislative intent, §287.017 Purchasing categories, threshold amounts, §287.057 Procurement of commodities or contractual</p>	<p>LWCS will develop and submit a locally approved Procurement Policy meeting requirements as noted. These items will be added to our Financial Manual.</p> <p>Alricky Smith will be responsible for finalizing for board approval and Anna Barcenas will submit the new and updated Finance Manual.</p>	<p>Procurement Policy will be updated in the Financial Manual and sent to the DOE by March 20, 2020.</p>

	services, §287.093 Minority business enterprises; procurement of personal property and services from funds set aside for such purpose and §838.22 Bid tampering.		
Plan submitted by (name and title): Anna Barcenas, Assistant Principal & CTE Director		Date: 01/13/2020	
Plan accepted by: Christine Walsh		Date: 01/14/2020	
Status of Action Plan (to be completed by FDOE staff):			
Date:		Status of Plan Completion:	