



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

**Quality Assurance and Compliance
Virtual Desk Monitoring Review
for
Adult Education and Career and Technical Education**

Baker County School District

February 22 – 26, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Baker County School District
Adult Education and 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 2020-21 Core Monitoring Guide, which is posted to the Department's website at <https://www.fldoe.org/academics/career-adult-edu/compliance/>.

III. QUALITY ASSURANCE CORE MONITORING GUIDE

The Quality Assurance Policies, Procedures and Protocols manual was discontinued after the 2019-20 program year. The Quality Assurance and Compliance section will now operate from the Core Monitoring Guide (CMG). The guide provides a summary of each Core Activity and objective of the monitoring design and process.

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 Baker County School District (BCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mrs. Sherrie Raulerson, superintendent, Baker County School District on December 1, 2020. The designated representative for the agency was Mrs. Carrie Dopson.

The representative of the division conducting the VDMR was program specialist Mr. Orion Price of the Quality Assurance and Compliance section.

V. BAKER COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 2,249

AE: 76

The provider was awarded the following grants for FY’s 2018-19, 2019-20 and 2020-21:

Finance*

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	020-1919B-9CG01	\$ 81,057.00	\$ 4.70
Perkins Secondary	020-1619B-9CS01	\$ 58,191.00	\$ 0.43
Perkins Rural	020-1619B-9CR01	\$ 36,645.00	\$ 1.78

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	020-1910B-0CG01	\$ 81,057.00	\$ 16,211.00
Perkins Secondary	020-1610B-0CS01	\$ 61,015.00	\$ 114.77
Perkins Rural	020-1610B-0CR01	\$ 25,207.00	\$ 1,278.00

FY 2020-21*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	020-1911B-1CG01	\$ 81,057.00	\$ N/A
Perkins Secondary	020-1611B-1CS01	\$ 54,940.00	\$ N/A
Perkins Rural	020-1611B-1CR01	\$ 43,148.00	\$ N/A

* Final project disbursement reports not available at the time of this writing.

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

<https://www.bakerk12.org/>

VI. MONITORING ACTIVITIES

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

Onsite Visits

No onsite visits were made during the VDMR process.

Entrance and Exit Conferences

An introductory teleconference for BCSD was conducted on February 22, 2021. The exit teleconference was conducted on February 26, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Carrie Dopson	Director of Career and Adult Education	X	X
Emily Clevenger	Career Specialist	X	X
Brandy Davis	Reports Coordinator	X	X
Angela Bailey	Front Desk Receptionist	X	X
Debbie Charko	High School Career Specialist	X	X
FDOE Monitoring Team			
Orion Price	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	X

Interviews

BCSD administrators were available via teleconference for interviews, if necessary.

Records Review

Program, financial and administrative records were reviewed. A complete list is provided in section VII, item F. 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.
- BCSD has comprehensive policies and procedures that dictate the approval process before a grant application is submitted to FDOE. The AE and CTE directors work with their department heads, advisory committees, and district finance staff to assess the needs of programs. Once needs are identified and included in the grant applications, they are reviewed and approved by Mrs. Dopson.
 - Once approved by FDOE, the AE and CTE grants for BCSD are distributed by Mrs. Dopson and her team. Both program areas follow the same procedures for financial tracking and oversight.
 - The comprehensive local needs assessment (CLNA) included in the BCSD Perkins grants required consultation with numerous community and business leaders. These stakeholders include teachers, local business owners, community leaders and other educational specialists. Secondary steering committees and post-secondary advisory committees will continue to provide ongoing reviews and updates to the CLNA.

- BCSD offers ample opportunities for district-wide training and professional development. AE and CTE administrative staff participate in annual conferences within their program areas, and FDOE sponsored training events and webinars are also attended.

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.

- BCSD utilizes the Skyward® system as its integrated student information system (SIS) and management information system (MIS).
- Frequent trainings are provided to administrative staff on National Reporting System requirements (AE only), data collection procedures, data entry and other pertinent areas of the MIS.
- All the data elements required of their local MIS were included in the system and verified during the desk review.
- District registration forms include student “release of information” clauses as required by the Family Educational Rights and Privacy Act (FERPA).
- Program staff verifies student data prior to the records being uploaded to the SIS. Data is then run through edit reports within the SIS to ensure accuracy prior to submission to the state.
- The district has internal controls that ensure everyone has access to only a specific part of the MIS to prevent too many people from being able to view sensitive student data.
- The AE and CTE directors regularly meet with their administrative staff to discuss trends within data reports. These meetings help to ensure that program needs, and grant objectives are being met.
- Samples of AE and CTE student data were reviewed and verified for accuracy as part of the VDMR. BCSD provided all student records.

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

- The CTE program is guided by a strong advisory committee that offers program recommendations, insight into current industry trends and updates on local workforce needs. The AE program also has a regional advisory committee that meets minimally twice per year.
- The district provides resources such as CareerSource and Eckerd Connects Workforce Development to help students be workforce ready.
- No reasonable services and accommodations are denied to those students who self-declare a disability.
- CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), internships and other work-based learning.
- AE instructors are trained to incorporate CTE skills and related content into daily classroom instruction.
- The district has a memorandum of understanding (MOU) with CareerSource Northeast Florida (First Coast Workforce Development, Inc.) to provide career services and training for students.
- Tests of adult basic education (TABE) is used for student skill level assessment. All TABE test proctors are certified as required by FDOE and the testing companies.

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.

- All inventory criteria set forth by EDGAR and the UGG is included within the inventory management system. The inventory management system was verified during the VDMR.
- Photographic evidence of inventory was reviewed as part of the VDMR process.
- The district has a technology plan that includes policies on new equipment requests, equipment safety/storage and disposal of old inventory.
- There have been no reports of stolen or lost equipment over the previous three fiscal years.

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) for school districts 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.

- Size, scope and quality review
- CLNA
- MIS data quality checklists
- District policies and procedures for finance and procurement
- District technology plan
- Student and employee handbooks
- Inventory records
- Procurement records
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign in sheets, etc.
- District professional development and training records – agendas, sign in sheets, training materials, etc.
- AE and CTE student data review

G. FINANCIAL: refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management and allowable costs.

- The district has financial policies and procedures in place to ensure the efficient management of CTE and AE grant funds.
- The district has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants. The chain of approval for a grant funded purchase is filtered through the district from teacher to board of directors. All purchases must receive final approval from the district board of directors.
- BCSD has checks and balances in place to ensure accurate accounting records. Bookkeepers and accounting specialists work with program directors to keep track of all grant funded expenditures.

- Program directors and administrative staff meet monthly to review expenditure reports and to determine a grants current financial standing. Budget amendments are submitted to FDOE if the opportunity arises.
- Monitoring staff conducted a budget analysis of BCSD’s FDOE grants. Upon review, the following non-compliance findings were discovered:
 - (G1): CTE and AE for 2018-19, 2019-20 budget narratives which resulted in the DOE project disbursement report forms 399 (CTE) and 499 (AE) to include the following errors:
 - Expenditures in several object codes, (CTE 18-19: 230; 330; 643; 691; 692 and 750) (CTE 19-20: 230; 643; 691; 692; 622 and 750) (AE 18-19: 350; 390; 641; 642; 643; 648; 649 and 690) (AE 19-20: 350; 359; 641; 642; 643; 644; 648; 649; 690; 750 and 330) were previously approved by FDOE on original grant, and not expended on final expenditure report. No amendments were submitted to FDOE to remove object codes.
 - Expenditures in the above-referenced object codes are deemed allowable under this federal program. No cost recovery is required.

FINDING AND ACTION

- Finding G1: The provider failed to request a budgetary amendment for an expenditure that was not previously approved in their original grant application. This is in violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B “Project Amendments.”
 - Corrective Action G1: (1) The CTE director shall provide a memo of attestation stating the college acknowledges the finding. No other action is required.

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.

- BCSD has numerous collaborations for articulation 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:
 - CareerSource Northeast Florida
 - North Technical College
 - Florida Gateway College
 - Florida State College at Jacksonville

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

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

ADULT EDUCATION

1. Corrective Action Plan – BCSD is required to complete an AE Corrective Action Plan.

IX. SUMMARY

Once the VDMR 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 sent 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 Baker County School District virtual desk monitoring review. Special thanks is offered to Ms. Carrie Dopson for her participation and leadership during this VDMR process.

APPENDIX A

Baker County School District
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: Baker County School District					
Program Type: CTE					
Target Year: 2018-2019					
Monitoring Year: 2020-2021					
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	3	<u>X8</u>	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	3	<u>X 8</u>	24
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	7	<u>X 6</u>	42
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	<u>X 6</u>	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	1	<u>X 4</u>	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					218

Data sources used for calculations: Prior to July 1, 2019

Baker County School District
Adult Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants					
Agency Name: Baker County School District					
Program Type: AE					
Target Year: 2018-2019					
Monitoring Year: 2020-2021					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	7	<u>X10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	3	<u>X 8</u>	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	3	<u>X 8</u>	24
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	7	<u>X 6</u>	42
	No	0			
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	7	<u>X 6</u>	42
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	1	<u>X 4</u>	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Adult Education Program Improvement Plan (AEPiP)	Target Not Met on 3 of 3 Indicators	5	3	<u>X 6</u>	18
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
Agency Risk Score					236

Data sources used for calculations: Prior to July 1, 2019

APPENDIX B

Baker County School District
Required Action Plan

Finding	Required Action	Agency Response	Projected Date of Completion
<p>Finding G1: The provider failed to request a budgetary amendment for an expenditure that was not previously approved in their original grant application. This is in violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."</p>	<p>Corrective Action G1: (1) The CTE director shall provide a memo of attestation stating the district acknowledges the finding. No other action is required.</p>	<p>BCSD acknowledges the finding and has established a process for requesting budgetary amendments on all Adult Ed and CTE grants.</p>	<p>5/18/2021</p>
<p>Plan submitted by: Carrie Dopson Director AE and CTE</p>		<p>Date: 04/13//2021</p>	
<p>Plan accepted by: Orion Price, Quality Assurance and Compliance</p>		<p>Date: 5/18/2021</p>	
<p>Status of Action Plan (to be completed by FDOE staff):</p>			
<p>Date: 5/18/2021</p>		<p>Status of Plan Completion: Completed</p>	