FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Collier County Public Schools

May 10 - 14, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

Collier County Public Schools
Adult Education and Career and Technical Education
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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 still under review.

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 Collier County Public Schools (CCPS) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Kamela Patton, superintendent, Collier County Public Schools on December 1, 2020. The designated representative(s) for the agency were Mr. Carlos Artime and Ms. Yolanda Flores.

The representative of the division conducting the VDMR was program specialist, Michael Swift of the Quality Assurance and Compliance section.

V.   COLLIER COUNTY PUBLIC SCHOOLS

ENROLLMENT:

Fiscal Year (FY) 2018-19
CTE (possible duplication at program level): Secondary – 16,019; Post-secondary – 4,116
AE: 2,810

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

Finance
FY 2018-19

Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	110-1619B-9CS01	$ 452,791.00	$ 0.00
Perkins Post-secondary	110-1619B-9CP01	$ 150,686.00	$ 0.00
Adult General Education	110-1919B-9CG01	$ 584,338.00	$ 0.00
Adult Education - Civics	110-1939B-9CE01	$ 204,133.00	$ 0.00
Adult Education - Corrections	110-1919B-9CC01	$ 100,000.00	$ 15,899.84

FY 2019-20

Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	110-1610B-0CS01	$ 548,667.00	$ 7,098.56
Perkins Post-secondary	110-1610B-0CP01	$ 206,269.00	$ 0.00
Adult General Education	110-1910B-0CG01	$ 584,338.00	$ 0.00
Adult Education - Civics	110-1930B-0CE01	$ 204,133.00	$ 0.00
Adult Education - Corrections	110-1910B-0CC01	$ 100,000.00	$ 0.00

FY 2020-21*

Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	110-1611B-1CS01	$ 472,239.00	$ N/A
Perkins Post-secondary	110-1611B-1CP01	$ 186,396.00	$ N/A
Adult General Education	110-1911B-1CG01	$ 584,338.00	$ N/A
Adult Education - Civics	110-1931B-1CE01	$ 204,133.00	$ N/A
Adult Education - Corrections	110-1911B-1CC01	$ 100,000.00	$ 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.collierschools.com/

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 CCPS was conducted on May 10, 2021. The exit teleconference was conducted on May 14, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Carlos Artime	Director, Secondary CTE	X	X
Nicole Litchko	Manager, Secondary CTE	X	X
Fred Rimmler	CLNA Coordinator, Secondary CTE	X	X
Carla Burdick	Specialist II/Financial, Secondary CTE	X	X
Yolanda Flores	Administrative Director, Post-Secondary, Adult and Community Education	X	X
Dorin Oxender	Director, Immokalee Technical College	X	X
Ariel Pechokas	Assistant Director, Adult Education	X	X
Aaron Paquette	Assistant Director, Immokalee Technical College	X	X
Sam Green	Specialist II, LWTC/Adult Education	X	X
Frank Ramsey	Coordinator, Budget and FTE Allocations	X	X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	X
Orion Price	Program Specialist, QAC, FDOE	X	X

Interviews
CCPS 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. <u>ADMINISTRATION:</u> refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.

- The Collier County CTE and AE grants are managed by two separate groups of administrators, but follow the same process for the drafting, approval and submissions of their grants to FDOE.
    - The Assistant Director of AE works with the coordinator of Workforce Budgets and the district bookkeeper. Outside consultants from the Collier County jail and CareerSource Southwest Florida also provide input for the grant applications.
    - The Director of CTE works with the comprehensive local needs assessment (CLNA) coordinator, the CTE manager and the district bookkeeper. Input from the CLNA is strongly considered when determining what needs and goals will be addressed via the grant applications.
    - Once all grant applications are complete, the district superintendent has final approval prior to submission to the state. All amendments follow the same approval process.
- The CTE and AE directors meet with district finance specialists and the district grants office on a regular basis to track and monitor all expenditures charged to their grants. This helps to ensure that all federal and state requirements of each grant are being met.
- Grant preparation for an upcoming fiscal year typically begins in the winter/spring prior to the next school year. At that point in time the CTE and AE directors are already working to determine what needs may be included in the upcoming grant applications.
- Despite being managed by different administrative staff, the CTE and AE programs operate as a cohesive unit and have regular meetings to ensure that both program areas are operating in the best interest of students.
- As part of the required CLNA, CTE administrative staff consulted with numerous individuals and entities across the district's service area. Those stakeholders included but weren't limited to students; teachers; CareerSource Southwest Florida; and multiple local business and community leaders. AE administrative staff consulted with additional representatives from Lee County School District and Hendry County School District. Stakeholders were specifically selected to represent the varying demographics and income/poverty levels seen across the county.
- The district already implements program review plans that take place annually, but the CLNA took that aforementioned process and expanded on it. The district will also adopt some of the practices from the CLNA to include in their AE program reviews.
- All stakeholders who participated in the CLNA process are expected to serve as ongoing consultants to the CTE program.

B. <u>DATA AND ASSESSMENT:</u> 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.

- CCPS utilizes FOCUS® and Data Warehouse as their integrated management information system (MIS). The district has policies and procedures on data collection and offers annual training to CTE and AE administrative staff and teachers. Administrative staff also attends FDOE sponsored training and professional development events such as the Florida Association of Career and Technical Education (FACTE) and Workforce Education and District Data Advisory Council (WEDDAC) annual conferences.
- Most data entered into FOCUS® is handled at the local school level and monitored by the district Accountability and Data Management department. The district uses the integrated error and verification reports within FOCUS® to identify any missing and/or inaccurate data

elements prior to submission to the state. In the event that errors are still detected by the FDOE edit report after submission to the state, the district Manager of Data Surveys is responsible for reaching out to the appropriate school liaison to rectify the error. Once the error is corrected, the data is then (re)submitted to FDOE.

- All proctors of the Tests for Adult Basic Education (TABE) and the Comprehensive Adult Student Assessment System (CASAS) are trained and certified, as required, by the state and the appropriate testing companies. Local policies and procedures on testing are also in place.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- Student electronic files include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
- Samples of CTE and AE student data were reviewed and verified for accuracy as part of the VDMR. No errors were found. All student records were provided by CCPS.

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

- CCPS offers CTE and AE programs across multiple campuses and school sites throughout Collier County. Although CTE academies are available across the county, some programs are only offered at specific schools. AE services are also provided at the Collier County correctional facility.
- CCPS is unique in that they are a minority-majority school district, and teachers throughout the district represent the diverse demographics of the county.
- Prior to the newly required CLNA, the district already conducted program viability reviews driven by workforce needs, workforce data, student enrollment numbers and job prospects. The results of those program reviews were confirmed by the CLNA. Most notable was the decision to expand the Health Sciences Academy across the entire district and to expand Entrepreneurship at all elementary schools. The CLNA also confirmed the district's decision to begin phasing out some programs.
- There is a strong push across the district to increase non-traditional student enrollment in CTE programs. Student groups such as the Golden Girls and Girls Entering Engineering are direct results of the districts engagement with non-traditional students.
- Due to the ongoing COVID19 pandemic, the district was forced to adjust how they offered in-person instruction to students. Despite the adjustments, the CTE program still maintained a 90% in person participation rate, and increased the number of students taking part in internships. The AE program experienced a minor dip in enrollment, but virtual learning did afford most students the opportunity to continue their education.
- The district has taken all necessary steps to ensure that adult students have every opportunity to continue their education, in addition to work and/or family responsibilities. The AE program offers evening classes at multiple high schools and satellite sites across the county. Also, students are able to participate in daytime or nighttime classes to fit their schedules. The district will also continue to offer virtual learning although in-person classes have resumed.
- CCPS offers CTE students multiple opportunities to participate in additional learning activities outside of the classroom.
  - Work based learning, internships and on the job training (OJT) is a priority within the district.
  - Certain part time jobs can also be converted to internships that allow students to earn school credits while working.
  - Students participate in Career and Technical Student Organizations (CTSOs).
  - Qualified high school CTE students are also able to dual enroll at Immokalee Technical College (ITC) and Florida Gulf Coast College (FGCC).

- Future Ready Collier offers professional development training to graduating students to better prepare them for entry into the workforce. Other services such as CareerSource Southwest Florida are also available for students.
- The district offers several services to assist adult students transitioning to post-secondary CTE education.
  - The Health Bridge program transitions AE students into the healthcare program at ITC.
  - The county jail offers counseling programs for inmates as they prepare to re-enter society, and there is assistance available to those who wish to enroll in a CTE post-secondary program.
  - CCPS has an apprenticeship grant for AE students to enroll in the heating, ventilation, and air conditioning (HVAC) program.
- AE and CTE instructors participate in ongoing trainings provided by FDOE, as well as annual professional development through the district. Program specific trainings are also attended as required.
- No reasonable services and accommodations are denied to those students who self-declare a disability. The district works with disabled students to ensure their individual needs are being met.

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.
- The district has a technology plan that includes policies on new equipment requests, equipment safety/storage and the disposal of old inventory.
- There have been no reports of stolen or lost equipment over the previous three fiscal years. Policies and procedures are in place for the reconciliation of equipment that may be stolen or lost. In addition, property management is discussed during the district's operations workshop at the beginning of each school year.
- Although no onsite visits took place over the course of the VDMR, equipment and inventory was verified via samples of procurement records and pictures.

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 (OEEO) for school districts is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEO 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
- Program brochures
- Inventory records and pictures

- Procurement records
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign in sheets, etc.
- CTE and AE student data review
- TABE proctor training
- District articulation agreements and memorandums of understanding
- Internship and on the job training policies and procedures
- Professional development and training documents

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.

- Terms® is used as the district's Enterprise Resource Planning (ERP) system.
- The district has financial policies and procedures in place to ensure the efficient management of CTE and AE grant funds.
  - Purchasing with federal grant funds policies
  - Fiscal planning procedures
  - District grants budget guide
  - Cash management guide
- Purchase orders are only created and authorized for items previously approved in the FDOE federal grant applications. Once a purchase has been authorized, the method of procurement is determined based off the price of the item(s). Depending on the type of purchase the AE or CTE director will consult with the district facilities department to discuss fit and placement within a classroom or learning area.
- Grant managers work closely with the district finance department and local financial specialists to track grant expenditures. Regular meetings are held to determine the current financial standings of each grant, and to ensure that grant expenditures are being managed properly. Budget amendments are submitted to FDOE if the opportunity arises.
- The district has a strict deadline to submit any FDOE grant budgetary amendments to the superintendent for approval prior to submission to the state. This deadline is April of the current fiscal year.

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.

- CCPS has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners include, but are not limited to:
  - CareerSource Southwest Florida
  - Lee County School District
  - Hendry County School District
  - Collier County Chamber of Commerce
  - Collier County Jail
  - Collier County Library
  - Matthew House
  - Lutheran Services
  - Immokalee Technical College
  - Embry Riddle
  - Florida Gulf Coast University
  - Florida Southwestern State College

VIII.   REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION
1.   Corrective Action Plan – CCPS is not required to complete a CTE Corrective Action Plan.

2.   Corrective Action Plan – CCPS is not 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 Collier County Public Schools virtual desk monitoring review. Special thanks is offered to Mr. Carlos Artime and Ms. Yolanda Flores for their participation and leadership during this process.

APPENDIX A

Collier County Public Schools
Career and Technical Education
Risk Matrix

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

Agency Name: **COLLIER COUNTY PUBLIC SCHOOLS**
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	**5**	X 10	**50**
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	**7**	X8	**56**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	**3**	X 8	**24**
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	**0**	X 6	**0**
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	**0**	X 6	**0**
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	**0**	X 4	**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	**1**	X 4	**4**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
				AGENCY RISK SCORE:	**134**

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

Collier County Public Schools
Adult Education
Risk Matrix

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

Agency Name: **COLLIER COUNTY PUBLIC SCHOOLS**
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	5	X10	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	7	X 8	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	5	X 8	40
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	5	X 4	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	1	X 4	4
	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	5	X 6	30
	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	**200**

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