

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

The School District of DeSoto County

October 19 - 23, 2020

Final Report

TABLE OF CONTENTS

I.	Introduction	1
II.	Authority	
III.	Quality Assurance Policies, Procedures, and Protocols	
IV.	Provider Selection	1
V.	The School District of DeSoto County	2
VI.	Monitoring Activities	
VII.	Results	3
VIII.	Required Resolution Activities	6
IX.	Summary	7
	Appendix A	
	Appendix B	. 10
	Attachment A	. 11

Florida Department of Education Division of Career and Adult Education

The School District of DeSoto County 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 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 The School District of DeSoto County (DeSoto) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Adrian Cline, superintendent, School District of DeSoto County on August 28, 2020. The District now has a new Superintendent, Dr. Bobby Bennett. The designated representative(s) for the agency was Ms. Kathy Severson.

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

V. THE SCHOOL DISTRICT OF DESOTO COUNTY

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 2,093

AE: 280

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

Finance

FY 2018-19

Grants Adult General Education Adult Education – IELCE	Grant Number	Grant Amount	<u>Unexpended</u>
	140-1919B-9CG01	\$ 154,069.00	\$ 0.00
	140-1939B-9CE01	\$ 46,315.00	\$ 0.00
Perkins Secondary	140-1619B-9CS01	\$ 90,089.00	\$ 787.45
Perkins Rural	140-1619B-9CR01	\$ 29,729.50	\$ 2,152.53
FY 2019-20* Adult General Education Adult Education – IELCE	140-1910B-0CG01	\$ 154,069.00	\$ N/A
	140-1930B-0CE01	\$ 46,315.00	\$ N/A
Perkins Secondary Perkins Rural	140-1610B-0CS01	\$ 91,215.00	\$ 556.64
	140-1610B-0CR01	\$ 30,943.50	\$ 2.37
FY 2020-21** Grants Adult General Education	<u>Grant Number</u>	Grant Amount	Unexpended
	140-1911B-1CG01	\$ 154,069.00	\$ N/A
Perkins Secondary	140-1611B-1CS01	\$ 80,827.00	\$ 787.45
Perkins Rural	140-1611B-1CR01	\$ 33,809.00	\$ 2,152.53

^{*} Final project disbursement reports not available at the time of monitoring.

^{**} Not all grant applications had been approved at the time of monitoring Additional information about the provider may be found at the following web address: https://www.desotoschools.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 DeSoto was conducted on October 19, 2020. The exit teleconference was conducted on October 23, 2020. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Kathy Severson	Director, Adult and Career Education	X	X
Joshua White	Principal, CTE	X	
Marilyn Goodman	Teacher, CTE		X
Theresa Wheeler	Data Entry Secretary	X	X
Tammy Barlow	Bookkeeper, CTE Postsecondary and AE	X	X
Jinny Schaefer	Bookkeeper, CTE Secondary	X	X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	X

<u>Interviews</u>

DeSoto 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 district's AE and CTE grants are managed by a single director. The director is responsible for creating the grants, managing all programmatic and financial aspects of their programs and approving all contract deliverables, if applicable.
 - The director works very closely with the district finance team to manage the grants current financial standing, and the likelihood of achieving a grant's financial goals. Budget amendments are submitted to FDOE as needed.
 - The district was assisted by numerous stakeholders during the creation of their Perkins V comprehensive local needs assessment (CLNA). Those stakeholders included: CareerSource Heartland; DeSoto County Chamber of Commerce; local advisory committees; South Florida State College; and multiple local business partners. The district will work with these stakeholders for the continued evaluation of its CTE programs.

- DeSoto offers ample opportunities for district-wide training and professional development. AE and CTE administrative staff and instructors participate in annual trainings within their program areas, and FDOE sponsored training events are also attended.
- **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.
 - DeSoto currently uses Skyward® as their management information system (MIS). All of the data elements required of their local MIS were included in the system and verified during the desk review.
 - District administrative staff attend FDOE sponsored trainings such as WEDDAC, ACE, Summer Symposiums and FACTE conferences. DeSoto also conducts localized trainings focused on district need and program data requirements.
 - Student applications include "Release of Information" statements as required under the Family Educational Rights and Privacy Act (FERPA).
 - Skyward® is able to provide the district with edit reports prior to the submission of student data to FDOE. Once the data entry specialist verifies the report(s), the data is submitted to the state and re-verified via FDOE generated survey reports.
 - The district data entry specialist reviews data reports to identify program improvement and areas of need. This information is shared with the AE and CTE director and then disseminated to teachers.
 - The district has strict policies, procedures and internal controls that ensure individuals have access to only a specific part of the MIS to preserve the integrity of sensitive student data.
 - Upon review of student performance data, it was discovered that one CTE student was reported as receiving an industry certification that the student did not earn. The student earned a different certification than what was reported to the state. This resulted in a finding. All student level data was made available to the FDOE monitoring staff during the VDMR.

FINDING AND ACTION

- Finding B1: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 "Monitoring and reporting program performance."
 - Corrective Action B1: The CTE director shall provide a memo of attestation stating that
 they accept the finding due to the error made on student data submitted to the state. No
 further action will be required.
- C. <u>CURRICULUM AND INSTRUCTION:</u> refers to those elements that contribute to student learning and skill acquisition.
 - DeSoto offers CTE and AE programs across multiple campuses and locations throughout the county.
 - An articulation agreement between DeSoto and South Florida State College allows qualified students to enroll in select collegiate and vocational programs.
 - No reasonable services and accommodations are denied to those students who self-declare a disability.
 - DeSoto has CTE advisory committees that offer insight on program and workforce needs. These advisory committees also participated in the creation of the district's CLNA.
 - AE and CTE instructors are all certified as required by their program areas. The district offers additional professional development and localized training throughout the year.
 - Tests of adult basic education (TABE) and the comprehensive adult student assessment system (CASAS) are used for student skill level assessment. All TABE and CASAS test proctors are certified as required by FDOE and the testing companies.

- **D.** <u>TECHNOLOGY AND EQUIPMENT:</u> 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 Property Control Manual that includes policies on new equipment requests, purchases, 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.** <u>ACCESS AND EQUITY:</u> 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. A sampling of financial and programmatic records are reviewed.
 - MIS data quality checklists
 - District policies and procedures for finance and procurement
 - District technology plan
 - Student and employee handbooks
 - Inventory records
 - Procurement records
 - Size, scope and quality review
 - CLNA
 - Memorandums of Understanding (MOUs) and articulation agreements
 - Advisory committee records agendas, sign in sheets, etc.
 - Professional development and training opportunities
 - AE and CTE student data review
 - TABE and CASAS certifications
- **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.
 - Skyward® is also the district Enterprise Resource Planning (ERP) system. The system allows for shared knowledge of grant expenditures and provides real time financial activity reports. Program directors only have access to financial reports relevant to their program areas and grants.
 - DeSoto has procurement and accounting policies and procedures in place to ensure the efficient cash management of CTE and AE grant funds. The method of procurement and chain of approval is dictated by the dollar value of a potential purchase, and the district Superintendent has final approval.
 - Procurement records were reviewed as part of the VDMR process, and all records follow federal, state and local laws and/or policies.

- DeSoto has multiple internal controls to ensure accurate accounting records. Bookkeepers
 and accounting specialists work with program directors to keep track of all grant funded
 expenditures.
- Monitoring staff conducted a budget analysis of DeSoto's FDOE grants. Upon review, the following non-compliance findings were discovered:

The district submitted DOE499/399 final expenditure reports that included overspending of grant funds in multiple object codes:

- o Project 140-1919B-9CG01 included over expenditures in object codes 510 and 230.
- o Project 140-1939B-9CE01 included over expenditures in object code 510.
- o Project 140-1619B-9CS01 included over expenditures in object codes 520; 330 and 369.
- o Project 282-1610B-0CR01 included over expenditures in object code 369.
- The over expenditures in the above object codes were not previously approved by FDOE, and no record of budgetary amendments were submitted to FDOE to authorize the additional spending.
- The over expenditures in the above-referenced object codes were deemed allowable under this federal program. No cost recovery is required.

FINDING AND ACTION

- Finding G1: The provider failed to request a budgetary amendment prior to overspending on previously approved grant object codes. This is in violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."
 - O Corrective Action G1: The district shall provide a memo of attestation stating the district acknowledges the finding. No other action is required.
- **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.
 - DeSoto 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:
 - DeSoto Memorial Hospital
 - DeSoto Health and Rehabilitation Center
 - o Goodwill Industries Manasota, Inc.
 - o Florida Department of Health in DeSoto County
 - South Florida State College
 - o CareerSource Heartland

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

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

ADULT EDUCATION

1. Corrective Action Plan – DeSoto 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 School District of DeSoto County virtual desk monitoring review. Special thanks is offered to Ms. Kathy Severson for her participation and leadership during this process.

APPENDIX A

The School District of DeSoto County Career and Technical Education Risk Matrix

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

Agency Name: The School District of DeSoto County

Program Type: CTE
Target Year: 2018-2019
Monitoring Year: 2020-2021

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7			
Number of Years Since Last	5-6	5	7	<u>X 10</u>	70
Monitored	3-4	3			70
	0-2	1			
	Upper Quartile	7			
Total Budget for all Perkins	Upper Middle	5	,	370	2.4
Grants Combined	Lower Middle	3	3	<u>X8</u>	24
	Lower Quartile	1]		
	4 or More	7			
N. I. CD II C. A	3	5	,	3 7. 0	2.4
Number of Perkins Grants	2	3	3	<u>X 8</u>	24
	1	1			
Change in Management Information Systems (MIS)	Yes	7	- 0	<u>X 6</u>	0
from Previous Fiscal Year	No	0	U	<u> </u>	U
Agency CTE Program Director	Yes	7	0	V 6	0
Change from Previous Fiscal Year	No	0	U	<u>X 6</u>	0
	Upper Quartile	7			
Unexpended Funds from all	Upper Middle	5			
Perkins Grants Combined	Lower Middle	3	3	<u>X 4</u>	12
Terkins Grants Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7			
Number of Findings from the	Upper Middle	5	_		
Office of the Auditor General	Lower Middle	3	5	<u>X 4</u>	20
omee of the Auditor General	Lower Quartile	1			
	0	0			
			AGENCY RISK	SCORE:	150

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

The School District of DeSoto County Adult Education Risk Matrix

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

Agency Name: The School District of DeSoto County Program Type: AE

Program Type: **AE**Target Year: **2018-2019**Monitoring Year: **2020-2021**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7	7		
Number of Years Since Last	5-6	5		<u>X10</u>	70
Monitored	3-4	3		<u> </u>	70
	0-2	1			
	Upper Quartile	7			
Total Budget for all Adult	Upper Middle	5	3	3 7.0	24
Education Grants Combined	Lower Middle	3		<u>X 8</u>	
	Lower Quartile	1			
	4 or More	7		<u>X 8</u>	
Number of Adult Education	3	5			24
Grants	2	3	3		24
	1	1			
Change in Management Information Systems (MIS)	Yes	7		V.	0
from Previous Fiscal Year	No	0	0	<u>X 6</u>	V
Agency AE Program Director Change from Previous Fiscal	Yes	7	0	<u>X 6</u>	0
Year	No	0			
	Upper Quartile	7			
Unexpended Funds from all	Upper Middle	5	0 <u>X</u>		
Adult Education Grants	Lower Middle	3		<u>X 4</u>	0
Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7	5 <u>X 4</u>		
Number of Eindings from the	Upper Middle	5		<u>X 4</u>	
Number of Findings from the Office of the Auditor General	Lower Middle	3			20
Office of the Auditor General	Lower Quartile	1			
	0	0			
	Target Not Met				18
	on 3 of 3	5			
	Indicators				
	Target Not Met		3 <u>X 6</u>		
Adult Education Program	on 2 of 3	3		X 6	
Improvement Plan (AEPIP)	Indicators			10	
	Target Not Met				
	on 1 of 3	1			
	Indicators				
	All targets met	0			
			Agency Ri	isk Score	156

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

APPENDIX B

The School District of DeSoto County Corrective Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion
Finding B1: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 "Monitoring and reporting program performance."	Corrective Action B1: The CTE director shall provide a memo of attestation stating that they accept the finding due to the error made on student data submitted to the state. No further action will be required.	Finding accepted. Director of CTE has met and will continue to meet with CTE staff on a regular basis to ensure no additional student data issues arise.	This response will be an ongoing process for the duration that the LEA is in receipt of this project.
Finding G1: The provider failed to request a budgetary amendment prior to overspending on previously approved grant object codes. 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: The district shall provide a memo of attestation stating the district acknowledges the finding. No other action is required.	Finding accepted. The Grants Manager will meet monthly with project bookkeeper to ensure that all expenditures are approved by FL DOE prior to any funds being spent.	This response will be an ongoing process for the duration that the LEA is in receipt of this project.

Plan submitted by (name and title): Kathy Severson, Dir	ector of Career, Technical & Adult Education
Date: January 5, 2021	
Plan accepted by: Michael Swift, Program Specialist IV Date: January 8, 2021	
2400. Variating 6, 2021	
Status of Action Plan (to be completed by FDOE staff):	Complete
Date:	Status of Plan Completion:

ATTACHMENT A

The School District of DeSoto County

The mission of the School District of DeSoto County is to prepare all students to be successful citizens and productive workers. Our mission applies to all Pre-K through Adult. The Division of Career and Adult Education is the post-secondary department of the School District of DeSoto County. This division serves the adult residents of DeSoto County by offering instructional programs of Adult General Education, Career and Technical programs and a comprehensive Family Literacy program.

Day, night and online classes are offered for the following classes:

- English for Speakers of Other Languages ESOL
- ESOL/ABE Transitional Class
- Adult Basic Education ABE
- General Educational Development GED

In addition, the following classes are offered on campus:

- Licensed Practical Nursing LPN
 - The LPN program has been serving the residents of DeSoto County for 38 years. We are excited to have started a HOSA (Health Occupations Students of America) chapter for our postsecondary students and are looking forward to them competing with other postsecondary schools at the January 2021 virtual conference.
- Certified Nursing Assistant CAN
- Learning Together Family Literacy Academy for parents and children, ages birth to five years of age
 - o Family Literacy, in DeSoto County, was first initiated in 2000 in cooperation with the DeSoto County Library. In 2001, we received a grant from the Barbara Bush Foundation to complement this literacy effort. Initiated in 2004, Learning Together Family Literacy Academy of DeSoto County, established by Jeb Bush, is still very much flourishing today as a successful family literacy project.

For the past five years, our AGE students have participated in a student learner essay contest sponsored by the Florida Literacy Coalition. Several adult students have been selected to be published to florida Literacy Coalition "Collection of Essays by Florida Adult Learners" book over the course of these five years. To recognize these individuals locally, the student is invited to read their submissions during our Student Renaissance Awards Ceremony/Assembly where students are recognized for their academic gains, attendance and attitude throughout the course of the semester.

Career and Technical Education, DeSoto County High School

The DeSoto County High School mission statement is to empower all students to become lifelong learners to compete in today's society. This includes a variety of Career and Technical Education programs that are offered to students in Grades 9-12, and afford them the opportunity to earn industry certifications. The desire of the district is to meet the individual needs and goals of our students as well as prepare them to be successful, productive citizens. The following Career Academies are offered at DeSoto County High School:

Health Sciences

- Home Health Aide
- Electrocardiograph Technician
- Nursing Assistant Acute & Long Term Care
 - Our secondary HOSA Chapter has consistently attended the HOSA (Health Occupations Students of America) state conference for 15 years and national conference for 13 years. At these conferences students compete in health science categories including knowledge tests and skills as well as public speaking. For several years our chapter finished in the top ten. Examples of our top ten finishes include: 2008 finished 1st Community Awareness; 2009 finished 5th Nursing Assistant; 2012 finished 4th Research and Persuasive Speaking; 2014 finished 3rd Nursing Assistant and Home Health.

Culinary Arts

- Students completing Culinary Arts 4 sit for their ServSafe certification exam which is administered by the U.S. National Restaurant Association.
- Student based learning projects occur regularly in the Culinary Arts Academy. On example was a recently planned virtual trip to Italy. The students produced and presented a wonderful power-point show relating to various cultural/health aspects of Italian life, and the Culinary Arts seniors (Culinary 4's) made a menu consisting of Spaghetti Bolognese with garlic bread, and a delicious tiramisu for dessert. The students were excited and engaged, learned about another country and had the opportunity to eat food that was out of their comfort zone!

Agriculture, Food and Natural Resources

• We have a thriving National FFA (Future Farmers of America) Chapter. For many years we have students selected to represent our chapter as Regional Officers and participated in the National FFA Conference and Exposition.

Animal Science and Services

Ag Foundations

Agritechnology

• Horticulture Science and Services

Administrative Office Specialist

- Introduction to Information Technology
- Administrative Office Technology 1, 2 and 3
- Business Software Applications 1 and 2

QuickBooks

Business Cooperative Education (OJT)

Building Construction Technology

Computer Systems & Information Technology

Digital Video Technology

• In this class, students handle all of the morning announcements at the high school as a portion of their class. This includes preparing for the announcements as well as the production of presenting the announcements.

Early Childhood Education

Marketing

- Marking Essentials
- Marketing Applications
- E-Commerce Marketing
- Marketing Management
- Business Ownership