



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Gadsden County School District

January 19-22, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Gadsden County School District
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 Gadsden County School District (GCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Elijah Key, superintendent, Gadsden County School District on December 1, 2020. The designated representative for the agency was Dr. Sylvia Jackson.

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

V. GADSDEN COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary - 1,511; Post-secondary - 89

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>
Perkins Secondary	200-1619B-9CS01	\$ 210,816.00	\$ 0.00
Perkins Rural	200-1619B-9CR01	\$ 72,964.00	\$ 0.00

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	200-1610B-0CS01	\$ 142,195.00	\$ 18,318.66
Perkins Rural	200-1610B-0CR01	\$ 74,141.00	\$ 3,318.58

FY 2020-21*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	200-1611B-1CS01	\$ 146,351.00	\$ N/A
Perkins Rural	200-1611B-1CR01	\$ 73,391.00	\$ 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:

<http://www.gadsdenschools.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 GCSD was conducted on January 19, 2021. The exit teleconference was conducted on January 22, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Dr. Sylvia R. Jackson	Director, Adult Career and Technical Education	X	X
LaClarence Mays	GCPS Budget Manager	X	X
Angela Sapp	GCPS CTE Coordinator	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

GCSD 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.

- GCSD has policies and procedures for writing and completing grant applications prior to being submitted to FDOE. The CTE director works with her program coordinators and advisory committees to determine what program needs will be addressed within their grant application. The grant application is then approved by the CTE director, district finance department and the district superintendent before submitting it to FDOE.
- The CTE director meets with the finance and budget director on a monthly basis to track and monitor all expenditures charged to their grants.
- The comprehensive local needs assessment (CLNA) included in the GCSD Perkins grants required consultation with numerous community stakeholders. Consultation included: students and teachers; Chipley, Marion and Taylor counties; Gadsden Technical Institute; and local business and community leaders.
- GCSD attends all FDOE sponsored trainings to stay abreast of federal and state requirements as it pertains to CTE. Local training is also offered to administrators and teachers.

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.

- GCSD utilizes the Skyward® system as their integrated management information system (MIS).
- GCSD CTE staff and program administrators participate in FDOE sponsored trainings such as: spring and fall Workforce Education and District Data Advisory Council (WEDDAC) meetings; Florida Association of Career and Technical Education (FACTE) and Division of Career and Adult Education (DCAE) presentations; the annual Adult and Community Education (ACE) conference; and other specialized trainings offered by DCAE.
- All of 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).
- GCSD has a multi-tiered data review process that takes place prior to student records being submitted to FDOE. CTE instructors are required to complete a Final Class Report which is reviewed by school data entry clerks, the district Director and MIS staff. Once this data is submitted into the MIS there is an additional error report that is run prior to submission to FDOE.
- Samples of CTE student data were reviewed and verified for accuracy as part of the VDMR. No errors were found. All student records were provided by GCSD.

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

- The district’s CLNA uncovered opportunities to build upon their Perkins programs that are currently up and running. GCSD will involve multiple stakeholders in the continued assessment of the local workforce needs. Future program offerings will be adjusted based off those needs.
- Students are offered the opportunity to participate in Culinary Arts and Administrative Office Specialist programs as early as middle school. These students will learn program basics and have a good foundation of knowledge that will allow them to transition into programs at the high school level.
- GCSD offers students multiple opportunities to participate in additional CTE learning activities outside of the classroom. District students are involved in CTE clubs and Career and Technical Student Organizations (CTSOs). Programs such as barbering and cosmetology afford students the opportunity to put classroom practices into real world action. Students work, under the supervision of instructors, with citizens in the community to provide discounted haircuts and cosmetic services. Qualified high school CTE students are also able to dual enroll at Gadsden Technical Institute.
- 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.
- CTE guidance counselors receive the same training as CTE administrative staff and teachers. This ensures a consistent flow of information between students, counselors and teachers.
- The district has a memorandum of understanding (MOU) with CareerSource Capital Region to provide career services and training for students.

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 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 (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
- Student and employee handbooks
- Inventory records
- Procurement records
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign in sheets, etc.
- 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.

- Skyward® is used as the district's Enterprise Resource Planning (ERP) system.
- The CTE director works with the budget and finance director to determine what expenses will be funded via their Perkins grant. Once these items are approved in their grant application, all expenditures run through an automated approval process within Skyward®. The district superintendent is the last line of approval prior to funds being released for a purchase.
- Monthly budget reports are shared among the CTE director and the finance director. These reports and meetings ensure that grant expenditures are being managed properly. Budget amendments are submitted to FDOE if the opportunity arises.
- The district has financial policies and procedures in place to ensure the efficient management of CTE grant funds.
- Monitoring staff conducted a budget analysis of GCSD's FDOE grants. Upon review, the following non-compliance findings were discovered:

The district submitted multiple DOE399 final expenditure reports that included expenditures for object codes that had not been previously approved via their original grant application and/or amendment:

- Project 200-1610B-OCS01 included unapproved expenditures for object codes 110; 128; 130; 133; 210; 220; 230; 232; 240; 510; 641 and 792.
- Project 200-1610B-OCR01 included unapproved expenditures for object codes 160; 210; 220; 230; 232; 240 and 792.
- The 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 spending.
- The expenditures in the unapproved object codes were reviewed as part of the monitoring process and deemed allowable under this federal program. No cost recovery is required.

FINDING AND ACTION

- Finding G1: The provider failed to request budgetary amendments prior to expending funds on previously unapproved 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 provider shall draft a memo of attestation stating the district 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.

- GCSD 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 includes, but are not limited to:
 - CareerSource Capital Region
 - Gadsden Center for Health Education
 - HealthSouth Rehabilitation Hospital of Tallahassee
 - Gadsden County Development Council
 - Big Bend Technical College
 - Tallahassee Community College

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – GCSD is required to complete a CTE 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 Gadsden County School District virtual desk monitoring review. Special thanks is offered to Dr. Sylvia Jackson for her participation and leadership during this process.

APPENDIX A

Gadsden 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: Gadsden 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>X 8</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	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	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					180

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

APPENDIX B

Gadsden County School District
Corrective Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion
Finding G1: The provider failed to request budgetary amendments prior to expending funds on previously unapproved 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 provider shall draft a memo of attestation stating the district acknowledges the finding. No other action is required.	N/A	N/A

<p>Plan submitted by (name and title): Dr. Sylvia Jackson, Director, Adult Career and Technical Education Date: March 23, 2021</p> <p>Plan accepted by: Michael Swift Date: March 23, 2021</p>	
<p>Status of Action Plan (to be completed by FDOE staff): Complete</p>	
<p>Date: March 23, 2021</p>	<p>Status of Plan Completion: Complete</p>