



FLORIDA DEPARTMENT OF  
**EDUCATION**  
CAREER AND ADULT EDUCATION

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

**Hendry County District Schools**

**May 10-14, 2021**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education

**Hendry County District Schools  
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 21<sup>st</sup> 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 Hendry County District Schools (HCDS) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Michael Swindle, superintendent, Hendry County District Schools on December 1, 2020. The designated representatives for the agency was Michael Swindle. The current representative is Mr. Kevin Lutkenhaus.

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

## V. HENDRY COUNTY DISTRICT SCHOOLS

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 6,762

AE: 295

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	260-1919B-9CG01	\$ 105,396.00	\$ 648.58
Adult IELCE	260-1939B-9CE01	\$ 52,736.00	\$ 64.54
Perkins Rural	260-1619B-9CR01	\$ 65,062.00	\$ 928.69
Perkins Secondary	260-1619B-9CS01	\$ 120,375.00	\$ 335.01

#### **FY 2019-20**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	260-1910B-0CG01	\$ 105,396.00	\$ 2,242.18
Adult IELCE	260-1930B-0CE01	\$ 52,736.00	\$ 7,145.56
Perkins Rural	260-1610B-0CR01	\$ 66,106.00	\$ 22,727.59
Perkins Secondary	260-1610B-0CS01	\$ 134,970.00	\$ 14,327.56

#### **FY 2020-21\***

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	260-1911B-1CG01	\$ 105,396.00	\$ N/A
Adult IELCE	260-1931B-1CE01	\$ 52,736.00	\$ N/A
Perkins Rural	260-1611B-1CR01	\$ 69,360.00	\$ N/A
Perkins Secondary	260-1611B-1CS01	\$ 119,677.00	\$ 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.hendry-schools.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 HCDS 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
Kevin Lutkenhaus	Director of Career and Technical Education & Adult Education	X	X
Kevin Rennolds	Database Administrator		X
<b>FDOE Monitoring Team</b>			
Chuck Davis	Program Specialist, QAC, FDOE	X	X

### Interviews

HCDS 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.
- HCDS has policies and procedures for writing and completing grant applications prior to being submitted to FDOE. The Policy Manual states that the Superintendent shall review grant opportunities and authorize development of proposals. The Grant Manager is responsible for audit, site visits, and final reports. These reports are first reviewed to identify any concerns. The Grant Manager confirms closure of all grants with the Superintendent.
  - HCDS, supports, collaborates, and actively promotes all activities of their CTE programs including Workforce Development. School Administrators have indicated that CTE is a priority in the overall school experience for all students. They continue to work with the following groups in their region: Region 24 Workforce Development Board, Career Source of Florida, parent and business advisory individuals and groups, Future Makers Coalition of SW Florida, all Administrators, teachers, in middle and high schools, representatives of the Hendry County School Board, and parents and students from all groups and subgroups.
  - AE and CTE administrative staff are provided opportunities to attend applicable professional development including industry specific conferences (Future Farmers of America (FFA/Leadership) and more universal conferences such as Florida Association of Career and Technical Education (FACTE) conference. In the future, HCDS will offer access and information on FACTE online courses and other relevant industry professional development.

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

- HCDS utilizes the FOCUS® system as its integrated management information system (MIS).
- Data staff and program administrators participate in a minimum of one FLDOE MIS/Work Force Development Information System training each year.
- All the data elements required of their local MIS were included in the system and verified during the desk review.
- Following the Family Educational Rights and Privacy Act (FERPA), HCDS students' records are protected. Generally, schools must have written permission from the parent or eligible student to release any information from a student's education record. The registration form (filled out each semester) contains a Release of Information page. If a student is under 18 years of age, his or her parent signs the form following FERPA guidelines.
- HCDS incorporates a data quality review plan prior to submitting any student data to the state. The district database administrator enters all student data, then reviews the workforce data information system (WDIS) validation report for errors. Once all mistakes are fixed, the district Systems Analyst submits the survey data to FDOE.
- Upon reviewing student performance data, it was discovered one student was reported as earning a literacy completion point (LCP) but did not meet the appropriate benchmarks for attainment.
- This will result in finding. The provider's responsibility is to be mindful of collecting and reporting data accurately, as outlined in the FDOE Data Handbook. The provider was informed of the data errors and acknowledge inaccurate data submission to FDOE.

#### 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 Provider is required to review the following: [AGE Placement and Reporting of Learning Gains - October 14, 2019, Webinar Presentation](#) (PDF) and [Q&A for AGE Placement and LCP Policy Updates for 2019-20 Reporting](#). The AE Coordinator shall draft and submit a memo of attestation stating their intentions to provide staff training in the area of LCP attainment and reporting. This memo shall include the anticipated date(s) of the training(s); the individual(s) responsible for conducting the training(s); the names and titles of those individuals to be involved in the training; including the instruments that were provided. Once the training and memo are submitted to your monitoring team lead, no further action will be required.

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

- With the new Perkins V Act, HCDS has developed an innovative approach to Career and Technical Education which puts their stakeholder's needs as paramount in how their local schools prepare an ever-changing workforce in their local communities and beyond. HCDS currently offers several high school credit courses to their students in Agriscience Foundations 1, Digital Information Technology, and Foundations of Web Design to their middle grade students. These classes allow students to transition into the agriculture, computer programming and digital design programs offered to high school students at Labelle High and Clewiston High.
- The HCDS's Grant Supervisor currently disseminates information on all CTE course offerings, including their sole Program of Study (POS) (Welding), through activities like: High school classroom presentations, printed publications including local newspapers, magazine advertisements and monthly newsletter. Also, they conduct orientations, Career Days and Middle School CTE Sampling day, etc. HCDS utilizes Mycareersshine as an online student career assessment and

planning tool, concentrating in middle school to help students and parents understand the CTE program opportunities within the school system.

- Students are actively engaged in Career and Technical Student Organizations (CTSO) such as Future Farmers of America (FFA) and Future Business Leaders of America (FBLA).
- All students with disabilities participate in annual individualized education plan meetings each year. Exceptional Student Education (ESE) specialists with expertise in transition and planning discuss academic and career opportunities available in the district.
- The Superintendent maintains an individual professional development plan for each administrator assigned to a school as a seamless component to the school improvement plans developed pursuant to State law. Also, the District provides a Professional Learning Catalog that outlines all professional learning opportunities.
- 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. 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 federal, state and local guidelines are 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 old inventory disposal.
- 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
- 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.
- Each month the Finance Assistant prints the Project Disbursement Reports (DOE 399) for each active project. These reports are first reviewed to identify any concerns. The Finance Assistant reviews for any budget over expenditures to see if the grant is close to having the budget expended or if there are any expenditures that look out of the ordinary for the grant. Notes are added and the reports are then sent to the Project Administrator to review.
- Apecs® is used as the district’s Enterprise Resource Planning (ERP) system. The system allows for shared knowledge of expenditures and real-time financial activity. All grant funds and purchase orders are managed within this system. The district is migrating to Skyward®.
- The district has detailed and thorough procedures for the procurement of equipment and inventory funded by its federal grants. The approval process for a purchase is determined by pre-set monetary thresholds set by the district. All capitalized purchases regardless of price can receive final approval from the district superintendent. The School Board must approve purchases of \$15,000 and above.
- Monitoring staff conducted a budget analysis of HCDS’s FDOE grants. Upon review, the following non-compliance findings were discovered:

(G1): CTE 2018-19, 2019-20 budget narratives which resulted in the DOE 399 (final expenditure report) to include the following:

- Expenditures in several object codes (100; 131; 200; 644 and 692) were not previously approved by FDOE, and no record of any budgetary amendments were submitted to FDOE to authorize the new object codes. Expenditures in object codes (120; 151; 210; 220; 510; 641 and 790) were overspent.
- 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 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.

- HCDS has numerous collaborations, articulation agreements, 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 of Florida
  - US Sugar Corporation
  - Lee Memorial Health Systems
  - Palm Beach Technical College
  - Charlotte Technical College
  - I-Tech of Collier
  - Fort Myers Technical College



## **VIII. REQUIRED RESOLUTION ACTIVITIES**

### **CAREER AND TECHNICAL EDUCATION**

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

### **ADULT EDUCATION**

1. Corrective Action Plan – HCDS 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 Hendry County District Schools virtual desk monitoring review. Special thanks is offered to Mr. Kevin Lutkenhaus for his participation and leadership during this process.

**APPENDIX A**

Hendry County District Schools  
Career and Technical Education  
Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants</b>					
Agency Name: <b>HENDRY COUNTY DISTRICT SCHOOLS</b>					
Program Type: <b>CTE</b>					
Target Year: <b>2018-2019</b>					
Monitoring Year: <b>2020-2021</b>					
<b>Metric</b>	<b>Scaling</b>	<b>Point Value</b>	<b>Points Assigned</b>	<b>Weight</b>	<b>Total Metric Points</b>
<b>Number of Years Since Last Monitored</b>	7 or More Years	7	<b>7</b>	<u><b>X 10</b></u>	<b>70</b>
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Perkins Grants Combined</b>	Upper Quartile	7	<b>3</b>	<u><b>X8</b></u>	<b>24</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Perkins Grants</b>	4 or More	7	<b>3</b>	<u><b>X 8</b></u>	<b>24</b>
	3	5			
	2	3			
	1	1			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Agency CTE Program Director Change from Previous Fiscal Year</b>	Yes	7	<b>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Unexpended Funds from all Perkins Grants Combined</b>	Upper Quartile	7	<b>3</b>	<u><b>X 4</b></u>	<b>12</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Number of Findings from the Office of the Auditor General</b>	Upper Quartile	7	<b>1</b>	<u><b>X 4</b></u>	<b>4</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>134</b>

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

Hendry County District Schools  
Adult Education  
Risk Matrix

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

Agency Name: **HENDRY COUNTY DISTRICT SCHOOLS**

Program Type: **AE**

Target Year: **2018-2019**

Monitoring Year: **2020-2021**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
<b>Number of Years Since Last Monitored</b>	7 or More Years	7	7	<u>X10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Adult Education Grants Combined</b>	Upper Quartile	7	3	<u>X 8</u>	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Adult Education Grants</b>	4 or More	7	3	<u>X 8</u>	24
	3	5			
	2	3			
	1	1			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	0	<u>X 6</u>	0
	No	0			
<b>Agency AE Program Director Change from Previous Fiscal Year</b>	Yes	7	0	<u>X 6</u>	0
	No	0			
<b>Unexpended Funds from all Adult Education Grants Combined</b>	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Number of Findings from the Office of the Auditor General</b>	Upper Quartile	7	1	<u>X 4</u>	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Adult Education Program Improvement Plan (AEPPI)</b>	Target Not Met on 3 of 3 Indicators	5	5	<u>X 6</u>	30
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
<b>Agency Risk Score</b>					<b>164</b>

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

**APPENDIX B**

Hendry County District Schools  
Corrective Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion
<p>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.”</p>	<p>Corrective Action B1: The Provider is required to review the following: <a href="#">AGE Placement and Reporting of Learning Gains - October 14, 2019, Webinar Presentation</a> (PDF) and <a href="#">Q&amp;A for AGE Placement and LCP Policy Updates for 2019-20 Reporting</a>. The AE Coordinator shall draft and submit a memo of attestation stating their intentions to provide staff training in the area of LCP attainment and reporting. This memo shall include: the anticipated date(s) of the training(s); the individual(s) responsible for conducting the training(s); the names and titles of those individuals to be involved in the training; and what training instruments will be used. Once the memo is submitted back to your monitoring team lead, no further action will be required.</p>	<p>Agency will take responsible and proactive action regarding the correct data reporting. TABE and CASAS training will be conducted August 3, 2021 with teachers involved. Follow up Q &amp; A where necessary. Kevin Lutkenhaus, and Specialist/CTE Liason will conduct training on the suggested PDF shown.</p>	<p>August 3, 2021 – through school year.</p> <p>Follow up refreshers to be held with all teachers involved.</p>
<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 accepts the finding. No other action is required.</p>	<p>Agency will work to shore up this error and will work to not repeat a task such as this.</p>	<p>Throughout the year – accurate maintenance of budgetary procedures.</p>
<p><b>Plan submitted by (name and title): Kevin Lutkenhaus (<a href="mailto:Lutkenhausk@hendry-schools.net">Lutkenhausk@hendry-schools.net</a>)</b>  <b>Date:</b> June 3, 2021</p> <p><b>Plan accepted by: Chuck Davis</b> <span style="float: right;"><b>Date:</b> 6/4/2021</span></p>			
<p><b>Status of Action Plan (to be completed by FDOE staff):</b></p>			
<p><b>Date:</b> 6/4/2021</p>	<p><b>Status of Plan Completion: Complete</b></p>		