



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

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

**Martin County School District**

**February 1 - 5, 2021**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education

**Martin County School District  
Adult Education and Career and Technical Education  
Quality Assurance and Compliance Monitoring Report**

**I. INTRODUCTION**

The Florida Department of Education (FDOE), Division of Career and Adult Education (division), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The Quality Assurance and Compliance (QAC) section is responsible for the design, development, implementation and evaluation of a comprehensive system of quality assurance including monitoring. The role of the quality assurance system is to assure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is incumbent upon the division to monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

**II. AUTHORITY**

The FDOE receives federal funding from the U.S. Department of Education (USDOE) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Strengthening Career and Technical Education for the 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 Martin County School District (MCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. John Millay, superintendent, Martin County School District on December 1, 2020. The designated representatives for the agency were Ms. Elia Parsons, CTE, and Ms. Theresa Luliucci, AE. The current representatives are Ms. Lana Barros, CTE, and Melissa Eversdyke, AE.

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

**V. MARTIN COUNTY SCHOOL DISTRICT**

**ENROLLMENT:**

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 6,328

AE: 516

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	430-1919B-9CG01	\$ 130,355.00	\$ 17,647.05
Perkins Secondary	430-1619B-9CS01	\$ 178,923.00	\$ .00

**FY 2019-20**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	430-1910B-0CG01	\$ 130,355.00	\$ 1,817.93
Perkins Secondary	430-1610B-0CS01	\$ 190,106.00	\$ 1,041.91

**FY 2020-21\***

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	430-1911B-1CG01	\$ 130,355.00	\$ N/A
Perkins Secondary	430-1611B-1CS01	\$ 175,920.00	\$ 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.martinschools.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 MCSD was conducted on February 1, 2021. The exit teleconference was conducted on February 5, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Lana Barros	Coordinator of College & Career Readiness (CTE)	X	X
Melissa Eversdyke	Coordinator, AE	X	X
Theresa Luliucci	Director of Student Services	X	X
Carter Morrison	CFO	X	X
Mary White	Director of Curriculum and Instruction	X	X
<b>FDOE Monitoring Team</b>			
Chuck Davis	Program Specialist, QAC, FDOE	X	X
Kara Kearce	Director, QAC, FDOE	X	X

### Interviews

MCSD 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.

- MCSD has policies and procedures for writing and completing grant applications prior to being submitted to FDOE. The AE and CTE coordinators work with their program coordinators and the district grants facilitator to ensure that all program needs are included within the grant application. Once the grant application draft is complete, the district superintendent must review it before it is sent to FDOE.
- AE and CTE program directors have regular meetings with the grant facilitator and the finance department to monitor grant expenditures.
- The comprehensive local needs assessment (CLNA) included in the MCSD Perkins grants required consultation with numerous community and business leaders. These stakeholders

include students and parents, Career Source Research Coast, local advisory committees, and Indian River State College.

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

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

- MCSD utilizes the FOCUS® system as its integrated management information system (MIS).
- Data staff and program administrators participate in district bi-monthly and quarterly webinars; 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 training 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).
- MCSD incorporates a data quality review plan prior to submitting any student data to the state. The district data entry specialist enters all student data, then reviews the workforce data information system (WDIS) validation report for errors. Once all errors are fixed the district Systems Analyst submits the survey data to FDOE.
- Upon reviewing student performance data, it was discovered 14 students were reported as earning a literacy completion point (LCP), but did not meet the appropriate benchmarks for attainment. This will result in a 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 error 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.
- For guidance and monitoring, a CTE coach are assigned to teachers.
  - Students are offered multiple opportunities for additional skill acquisition. Qualified high school CTE students are able to enroll in 20 programs of study at three High Schools.
  - No reasonable services and accommodations are denied to those students who self-declare a disability. The district Student Services department works with disabled students to ensure their individual needs are being met.
  - AE instructors are trained to incorporate CTE skills and related content into daily classroom instruction. AE departments are offered on two campuses, Stuart and Indiantown.
  - 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 (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
  - 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.
- FOCUSs® 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.
- Regular finance meetings take place between program directors, the grant facilitator and the finance department. These meetings are to ensure that grant expenditures are being appropriately managed.
- The district has detailed and thorough procedures for the procurement of equipment and inventory that is 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, must receive final approval from the district superintendent.
- Monitoring staff conducted a budget analysis of MCSD’s FDOE grants. Upon review, the following non-compliance findings were discovered:
  - (G1): CTE 2018-19, 2019-20 budget narratives which resulted in the DOE399 (final expenditure report) to include the following:
    - Expenditures in several object codes (122; 192; 295; 333; 360; 369; 397; and 644) were not previously approved by FDOE, and no record of any budgetary amendments was submitted to FDOE to authorize the new object codes.
    - Expenditures in the above-referenced object codes are deemed allowable under this federal program. No cost recovery is required.

**FINDING AND ACTION**

- Finding G1: The provider failed to request a budgetary amendment for an expenditure that was not previously approved in their original grant application. This is in violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B “Project Amendments.”
  - Corrective Action G1: (1) The CTE director shall provide a memo of attestation stating the 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.

- MCSD 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 Research Coast
  - Seacoast Bank
  - Martin Memorial Health Systems, Inc.
  - Research Coast Career Pathways Consortium
- MCSD has articulation agreements with Indian River State College, Culinary Institute of America, and Universal Technical Institute in Orlando.



## **VIII. REQUIRED RESOLUTION ACTIVITIES**

### **CAREER AND TECHNICAL EDUCATION**

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

### **ADULT EDUCATION**

1. Corrective Action Plan – MCSD 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 Martin County School District virtual desk monitoring review. Special thanks is offered to Ms. Lana Barros and Melissa Eversdyke for their participation and leadership during this process.

**APPENDIX A**

Martin County School District  
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>Martin County School District</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>5</b>	<u><b>X8</b></u>	<b>40</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>7</b>	<u><b>X 6</b></u>	<b>42</b>
	No	0			
<b>Unexpended Funds from all Perkins Grants Combined</b>	Upper Quartile	7	<b>7</b>	<u><b>X 4</b></u>	<b>28</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>5</b>	<u><b>X 4</b></u>	<b>20</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>224</b>

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

Martin County School District  
Adult Education  
Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants</b>					
Agency Name: Martin County School District					
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	1	<u>X 8</u>	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Adult Education Grants</b>	4 or More	7	1	<u>X 8</u>	8
	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	7	<u>X 6</u>	42
	No	0			
<b>Unexpended Funds from all Adult Education Grants Combined</b>	Upper Quartile	7	5	<u>X 4</u>	20
	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	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Adult Education Program Improvement Plan (AEPiP)</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>198</b>

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

**APPENDIX B**  
 Martin County School District  
 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 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.	3/15/2021	3/15/2021
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 accepts the finding. No other action is required.	3/15/2021	3/11/2021
<b>Plan submitted by (name and title): Ms. Lana Barros, Coordinator of College &amp; Career Readiness            Ms. Melissa Eversdyke, Coordinator of Adult Education</b>			
<b>Date: 3/12/2021 for both CTE and AE</b>			
<b>Plan accepted by: Chuck Davis</b>		<b>Date: 3/15/2021</b>	
<b>Status of Action Plan (to be completed by FDOE staff):</b>			
<b>Date: 3/15/2021</b>		<b>Status of Plan Completion: Complete</b>	