



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

School District of Palm Beach County

September 14 - 18, 2020

Final Report

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Florida Department of Education
Division of Career and Adult Education

**School District of Palm Beach 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 Palm Beach County (PBC) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Donald E. Fennoy, superintendent, School District of Palm Beach County on August 28, 2020. The designated representative(s) for the agency were Dr. Jeraline Johnson (CTE) and Ms. Jane Kim (AE).

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

V. SCHOOL DISTRICT OF PALM BEACH COUNTY

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 71,660

AE: 12,461

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	500-1919B-9CG01	\$ 1,972,807.00	\$ N/A
Adult Education – IELCE	500-1939B-9CE01	\$ 481,188.00	\$ N/A
Perkins Secondary	500-1619B-9CS01	\$ 1,968,649.00	\$ 129,077.32
Perkins DJJ	500-1619B-9CJJ01	\$ 63,806.00	\$ 39,070.36

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	500-1910B-0CG01	\$ 1,972,807.00	\$ N/A
Adult Education – IELCE	500-1930B-0CE01	\$ 481,188.00	\$ N/A

Perkins Secondary	500-1610B-0CS01	\$ 1,961,883.00	\$ N/A
Perkins DJJ	500-1610B-0CJJ1	\$ 64,400.00	\$ 64,346.75

FY 2020-21**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	500-1910B-0CG01	\$ 1,972,807.00	\$ N/A
Adult Education – IELCE	500-1930B-0CE01	\$ 481,188.00	\$ N/A

* Final project disbursement reports not available at the time of this writing.

** Not all grant applications were approved at the time of this writing.

Additional information about the provider may be found at the following web address:

<https://www.palmbeachschools.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 PBC was conducted on September 14, 2020. The exit teleconference was conducted on September 18, 2020. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Dr. Jeraline Johnson	Director, Choice and Career Options	X	X
Jane Kim	Manager Operations, AE	X	X
Dr. John Hay	Manager of Curriculum, AE	X	X
Fred Barch	Director, AE	X	X
John Anthony Boggess	Assistant Superintendent, Choice and Innovation		X
Tonya Johnson	Curriculum Specialist, CTE	X	X
Junnell Hughes	Curriculum Specialist, CTE	X	X
Anthony Ascì	Curriculum Specialist, CTE	X	X
Dr. Miguel Benavente	Curriculum Specialist, CTE	X	X
Jim Politis	Curriculum Specialist, CTE	X	X
Moise DeRosier	Curriculum Specialist, CTE	X	X
Kevin Sosa	Technical Analyst III	X	X
Barbara Brown	Administrative Assistant Non-Confidential II	X	X
Michelle Martin	Tech Accounting Senior	X	X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	X

Interviews

PBC 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.
- PBC worked with numerous stakeholders during the Perkins V transition year to assist in the creation of the district’s Comprehensive Local Needs Assessment (CLNA). Focus groups and advisory meetings included district administrators, parents and local business and community leaders. The district also hired a consultant to work specifically towards stakeholder engagement and the completion of the CLNA.
 - The program directors for AE and CTE have multiple years of experience in their respective program areas. Each director is responsible for supervising their respective programs; financial management and guidance of their grants; and assist with program development and improvement.
 - The management of AE and CTE programs is collaborative in nature. The directors for both program areas work closely with program managers, program specialists and budget specialists to ensure that grant objectives are met.
 - PBC conducts district-wide teacher training and professional development. AE and CTE administrative staff and instructors participate in annual trainings within their program areas, and attend FDOE sponsored training events and webinars.
- 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.
- PBC utilizes FOCUS® as their management information system (MIS), as well as their internal Educational Data Warehouse (EDW).
 - Frequent MIS and SIS trainings are provided virtually and face-to-face throughout each school term. Training topics include national reporting system (NRS) and local MIS requirements; data reporting updates and procedures; and instructional best practices. FDOE sponsored training events are also attended.
 - All of the data elements required of their local MIS were included in the system and verified during the desk review.
 - Student applications include “Release of Information” statements as required under the Family Educational Rights and Privacy Act (FERPA).
 - Data error reports are routinely run within the district SIS, and all student records are sent to the FDOE data quality preflight system for additional error detection. If any errors are returned they are reconciled at the school level.
 - In addition to technical assistance manuals on data assessment and data management, PBC has internal controls that ensure each individual has access to only the specific part(s) of the MIS/SIS required by their job description.
 - The AE and CTE directors regularly meet with their administrative staff to discuss trends within data reports. These reports are used to review and verify data accuracy and collection, as well as analyze data for program improvement and instructional success.
 - Upon review of student performance data provided by the Palm Beach County School District, it was discovered that eight students were reported as earning an occupational completion point (OCP), but did not meet the appropriate benchmarks for attainment. During the 2018-2019 program year, FDOE began to transition away from using OCPs as a proxy measure for technical skills attainment Perkins federal accountability measures (for secondary programs only). This will not result in a finding, it is the provider’s responsibility 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.

- Upon review of student performance data, it was discovered that eight 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. It is the provider's responsibility 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 AE director 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.

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

- PBC offers CTE programs across multiple secondary campuses, and qualified students also have the opportunity to earn collegiate credits while dual enrolled at Palm Beach State College and Florida Atlantic University. The district offers AE programs at on-campus sites and satellite sites in communities throughout the county. The aim of the district is to provide AE services for those most in need.
- The district uses media outlets, radio, newspaper, and social media to attract AE and CTE students. Due to the ongoing pandemic AE enrollment has declined, but the district has tasked individuals with keeping in touch with students and making them aware of what services are currently still available.
- The recruitment of non-traditional students in CTE is an ongoing problem, but the district has multiple programs to combat this issue. A few of those initiatives are Women in Aviation, Girls in Engineering and A Day in the Life of a Nurse.
- PBC employs a disability coordinator who works directly with students who self-declare a disability. No reasonable services and/or accommodations are denied to those students.
- Due to their urban location PBC admits that attracting new AE and CTE instructors can be challenging due to competition with the local job market and local salary demands. Once a new instructor is hired, the district has strong professional development and new-hire training programs.
- AE instructors are trained to incorporate CTE skills and related content into daily classroom instruction. The district is pushing to transition more students from AE directly into CTE via programs such as GED®i which allows qualified AE students to participate in select CTE programs.
- 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 EDGAR and the UGG is included within the inventory management system. The inventory management system was verified during the VDMR.
- Photographic evidence of inventory was reviewed as part of the VDMR process.
- 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 (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. A sampling of financial and programmatic records are reviewed.

- Size, scope and quality review
- CLNA
- MIS data quality checklists
- TABE and CASAS certifications
- Inventory records
- District policies and procedures for finance and procurement
- District technology plan
- Student and employee handbooks
- Procurement 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
- Time and effort reports
- Student progression plans

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 cash management of CTE and AE grant funds.
- PeopleSoft® is the district Enterprise Resource Planning (ERP) system. The system allows for the sharing of expenditure reports, and offers updates on real time financial activity.
- PBC has numerous checks and balances in place to protect accounting records. Program directors have limited, if any, access to the PeopleSoft® system.

- Program directors have regular meetings with administrative staff to discuss the current financial standing of their grants. Budget amendments are submitted to FDOE if the opportunity arises.
- The creation of a grant application and subsequent financial management of the grant is collaborative in nature. Grant managers and program directors work with the district budget department to determine what allowable costs may be included in an application.
- Monitoring staff conducted a budget analysis of PBC’s FDOE grants. Upon review, the following non-compliance findings were discovered:
 - (G1): IELCE 2018-19 budget narrative which resulted in the DOE499 (final expenditure report) to include the following:
 - Expenditures in several object codes (300 and 700) 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.
 - (G2): CTE Secondary 2019-20 Project Disbursement Final Report (DOE 399), funds expended to Charter School object code 300 (from a Health Science – CTSO cancelled charter bus), this expenditure was never reimbursed to the federal program.
 - Prior to the close of the 2019-20, close out report, PBC corrected this object code expenditure on the final DOE399. No cost recovery is required.

FINDING AND ACTION

- Finding G1 and G2: 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 and G2: (1) The CTE and AE directors shall provide a memo of attestation stating the district accepts 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.

- PBC 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 Palm Beach County
 - Florida Atlantic University
 - Palm Beach State College
 - Youthful Balance Medical Center

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – PBC is not required to complete a CTE Corrective Action Plan.

ADULT EDUCATION

1. Corrective Action Plan – PBC 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 Palm Beach County virtual desk monitoring review. Special thanks is offered to Dr. Jeraline Johnson and Ms. Jane Kim for their participation and leadership during this process.

APPENDIX A

School District of Palm Beach County
 Career and Technical Education
 Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: School District of Palm Beach County					
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	3	<u>X 10</u>	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	7	<u>X8</u>	56
	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	0	<u>X 6</u>	0
	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	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					166

Data sources used for calculations: Prior to July 1, 2018

School District of Palm Beach County
Adult Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants					
Agency Name: School District of Palm Beach County					
Program Type: AE					
Target Year: 2018-2019					
Monitoring Year: 2020-2021					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	3	<u>X10</u>	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	7	<u>X 8</u>	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education 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	0	<u>X 6</u>	0
	No	0			
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Adult Education 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	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Adult Education Program Improvement Plan (AEPiP)	Target Not Met on 3 of 3 Indicators	5	5	<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			
Agency Risk Score					168

Data sources used for calculations: Prior to July 1, 2018

APPENDIX B

School District of Palm Beach County
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>The AE director 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>Memo submitted on 12/11/2020.</p>	<p>n/a</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 AE director shall provide a memo of attestation stating the district accepts the finding. No other action is required.</p>	<p>Memo submitted on 12/14/2020</p>	<p>n/a</p>
<p>Plan submitted by (name and title): Dr. Jeraline M. Johnson, Director – Choice and Career Options Date: December 11, 2020</p>			
<p>Plan accepted by: Dr. Jeraline M. Johnson, Director – Choice and Career Options Date: December 11, 2020</p>			
<p>Status of Action Plan (to be completed by FDOE staff): Complete</p>			
<p>Date: 12/14/2020</p>		<p>Status of Plan Completion: Complete</p>	