



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Union County School District

February 1 – 5, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Union 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 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 Union County School District (UCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Mike Ripplinger, superintendent, Union County School District on December 1, 2020. The designated representative for the agency was Mr. Chris Mecusker for AE and CTE and Mrs. Ranae Prevatt for finance.

The representative of the division conducting the VDMR was program specialist Mr. Orion Price of the Quality Assurance and Compliance section.

V. UNION COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary – 2,249

AE: 61

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	630-1919B-9CG01	\$ 54,720.00	\$ 0.00
Perkins Secondary	630-1619B-9CS01	\$ 24,877.00	\$ 0.00
Perkins Rural	630-1619B-9CR01	\$ 24,852.00	\$ 0.00

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	630-1910B-0CG01	\$ 54,720.00	\$ 0.00
Perkins Secondary	630-1610B-0CS01	\$ 25,428.00	\$ 0.00
Perkins Rural	630-1610B-0CR01	\$ 25,207.00	\$ 0.00

FY 2020-21*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult General Education	630-1911B-1CG01	\$ 54,720.00	\$ N/A
Perkins Secondary	630-1611B-1CS01	\$ 22,827.00	\$ N/A
Perkins Rural	630-1611B-1CR01	\$ 37,174.00	\$ 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.union.k12.fl.us/>

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 UCSD 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
Chris Mecusker	Director AE & CTE	X	
Ranae Prevatt	Director Finance	X	X
Mike Ripplinger	District Superintendent	X	X
FDOE Monitoring Team			
Orion Price	Program Specialist, QAC, FDOE	X	X
Kara Kearce	Director, QAC, FDOE	X	X

Interviews

UCSD 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.

- The CTE and AE grants for UCSD are managed by Chris Mecusker.
- UCSD has established policies and procedures required with all approval processes prior to any grant application being submitted to FDOE.
- The AE and CTE director works with his financial director, superintendent, advisory committees and district finance staff to ensure the needs of the programs are met. Once those needs are addressed and included in the grant applications, they are reviewed and approved by the superintendent before being submitted to the FDOE.
- Once approved by FDOE, the AE and CTE grants for UCSD are distributed by Chris Mecusker, but all program areas follow the same financial tracking and oversight procedures.
- The comprehensive local needs assessment (CLNA) included in the UCSD Perkins grants required consultation with numerous community and business leaders. These stakeholders include teachers; local business owners; community leaders; and other educational specialists that all meet annually.
- UCSD offers ample opportunities for district-wide training and professional development. AE and CTE administrative staff participate in annual conferences within their program areas, while FDOE sponsored training events and webinars such as the FACTE conference are attended.

FINDING AND ACTION

- Finding A1: The Provider has not kept records of meetings with their administrative staff to show compliance of using data to make program evaluations in order to have better use of funds. This is a violation of WIOA 116(e)(1).
 - Corrective Action A1: The provider will keep an agenda and sign-in sheets of meetings that show the talking points of program and fund evaluations in order to maximize programs with grant funds.

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.

- UCSD utilizes the Skyward® system for the student information system (SIS) and management information system (MIS).
- Training is provided for staff for the National Reporting System requirements (AE only), data collection procedures, data entry and all other areas of the MIS. Administrative staff also participate in FDOE trainings.
- All of the data elements required of their local MIS were included in the MIS system screenshots and verified during the VDMR.
- UCSD's registration forms include student "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA) and included a registration form as evidence.
- Program staff verifies student data prior to the records being uploaded to the SIS. Data is then manually entered within the SIS to ensure accuracy prior to submission to the state.
- The district has internal controls that ensure each individual has access to a specific part of the MIS needed to complete tasks to prevent too many people from being able to view sensitive student data. This also acts as a check and balance for accuracy.
- Samples of AE and CTE student data was reviewed and verified for accuracy as part of the VDMR. UCSD provided all student records.

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

- The district provides resources such as CareerSource, working with local Colleges, and certifications available for a multitude of careers needed in CLNA.
- No reasonable services and accommodations are denied to those students who self-declare a disability. They refer to disabled students as exceptional and have a comprehensive policy and procedure to identify and cater to needs. The exceptional student progression guidelines was submitted as evidence.
- CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), internships and other work-based learning.
- AE instructors are trained to incorporate CTE skills and related content into daily classroom instruction.
- The district has a memorandum of understanding (MOU) with CareerSource Crown Florida to provide career services and training for students.
- UCSD has dual enrollment with three local colleges which include: Sante Fe College, University of Florida, and North Florida Technical College. They submitted the Dual Enrollment Agreements as evidence for each college that drills down requirements for students to participate.
- Tests of adult basic education (TABE) are used for student skill level assessment. All TABE 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. 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.
- 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 to ensure the efficient management of CTE and AE grant funds that filter through multiple members of the school board.
- UCSD has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants. The approval process is very consistent with UCSD being so small, as all purchases must receive final approval from the district Board of Directors and superintendent before being finalized.
- Program directors and administrative staff meet annually to review expenditure reports and to determine a grant's current financial standing. Budget amendments will be submitted to FDOE when needed. The financial director works with the personnel director and superintendent directly on all financial matters within the district.

- UCSD has a firm understanding of the needs of object codes on grants matching the DOE399. The financial director has already sent out a guideline with updated object codes from FDOE to expect that all object codes be monitored for correct coding going forward. Even though this was a finding for FY 2018-19, the financial director, Ranae Prevatt, was able to provide information showing she has been working on this issue for six months prior with her team to ensure it is resolved going forward.
- Monitoring staff conducted a budget analysis of UCSD'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 and DOE499 (final expenditure report) to include the following:
 - Expenditures in several object codes (CTE 18-19: 367 and 642) (CTE 19-20: 234; 235; 290; 367 and 641) (RCTE 18-19: 234; 235; 290; 510 and 731) (RCTE 19-20: 234; 235; 290; 519 and 731) (AE 18-19: 367; 120; 210; 220; 230; 234; 235 and 790) (AE 19-20: 120 and 691) were not previously approved by FDOE, and no record of any budgetary amendments was submitted to FDOE to authorize the new object codes.

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 memorandum of understanding (MOU) that are in place to benefit an agency's programs and students.

- UCSD has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The current partner is but not limited to:
 - CareerSource Florida Crown
 - North Florida Technical College (NFTC)
 - Santa Fe College (SFCC)
 - University of Florida (UF)

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

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

ADULT EDUCATION

1. Corrective Action Plan – UCSD 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 Union County School District virtual desk monitoring review. Special thanks is offered to Mr. Chris Mecusker for his participation and leadership during this process.

APPENDIX A

Union 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: UNION 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	5	<u>X 10</u>	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	1	<u>X8</u>	8
	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	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	1	<u>X 4</u>	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					86

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

Union County School District
Adult Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants					
Agency Name: UNION COUNTY SCHOOL DISTRICT					
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	5	<u>X10</u>	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	1	<u>X 8</u>	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	1	<u>X 8</u>	8
	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	1	<u>X 4</u>	4
	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	1	<u>X 6</u>	6
	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					76

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

APPENDIX B

Union County School District
Required Action Plan

Finding	Required Action	Agency Response	Projected Date of Completion
<p>Finding A1: The Provider has not kept records of meetings with their administrative staff to show compliance of using data to make program evaluations in order to have a better use of funds. This is a violation of WIOA 116(e)(1)</p>	<p>Corrective Action A1: The provider will keep an agenda and sign in sheets of meetings that show the talking points of program and fund evaluations in order to maximize programs with grant funds.</p>	<p>Letter of attestation provided, no further action required.</p>	<p>Feb 10, 2021</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 acknowledges the finding. No other action is required.</p>	<p>Letter of attestation provided, no further action required.</p>	<p>Feb 10, 2021</p>
<p>Plan submitted by (name and title): Michael Ripplinger, Superintendent Date: 02/10/2021</p>			
<p>Plan accepted by: Orion M Price Date: 02/10/2021</p>			
<p>Status of Action Plan (to be completed by FDOE staff):</p>			
<p>Date: Feb 10, 2021</p>	<p>Status of Plan Completion: Completed</p>		