

Quality Assurance and Compliance Virtual Desk Monitoring Review

for

Adult Education and Career and Technical Education

Marion County Public Schools

September 20 – 28, 2021

Final Report

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Florida Department of Education Division of Career and Adult Education

Marion County Public 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 designing, developing, implementing, and evaluating a comprehensive quality assurance system, 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 regularly.

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 under 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).

III. QAC CORE MONITORING GUIDE

The Core Monitoring Guide (CMG) is intended to be used broadly by any reviewer conducting an onsite or desk monitoring of any program currently administered by the division. The guide provides a summary of each facet of the monitoring design and the process. It also contains objectives that may be used as agencies are monitored or reviewed. It is located on the division's website at http://fldoe.org/academics/career-adult-edu/compliance.

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 strategies 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.

Marion County Public Schools (MCPS) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). A notification letter was sent to Dr. Diane Gullett, Superintendent, on July 14, 2021. The designated representative for the agency was Mr. Scott Carpenter, Vice President of Marion Technical College, as well as Ms. Ashley Morgan, CTE Director, and Ms. Denise Grosso, AE Director for MCPS.

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

V. Marion County Public Schools

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at a program level): Post-secondary – 56,134

The provider was awarded the following grants for FY's 2018-19, 2019-20 and 2020-21:

<u>Finance</u>

FY 2018-19

<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Secondary	420-1619B-9CS01	\$605,629.00	\$73,695.75
Post-secondary	420-1619B-9CP01	\$145,814.00	\$1,884.41
Adult Education	420-1919B-9CG01	\$491,326.00	\$23,351.18

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	Grant Amount	<u>Unexpended</u>
Secondary	420-1610B-0CS01	\$663,420.00	\$145,623.48
Post-secondary	420-1610B-0CP01	\$148,234.00	\$4,936.07
Adult Education	420-1910B-0CG01	\$491,122.00	\$25,487.74

FY 2020-21

<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Secondary	420-1611B-1CS01	\$605,629.00	N/A
Post-secondary	420-1611B-1CP01	\$191,334.00	N/A
Adult Education	420-1611B-1CG01	\$491,326.00	N/A

Additional information about the provider may be found at the following web address: https://www.marionschools.net/

VI. MONITORING ACTIVITIES

The monitoring activities included pre and post-review planning, entrance and exit conferences, records review and interviews with administrators, if necessary.

Onsite Visits

No onsite visits were made during the VDMR process.

Entrance and Exit Conferences

The entrance conference for MCPS was conducted on September 20, 2021. The exit conference was conducted on September 28, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Scott Carpenter	Assistant Principal, Marion Technical College	X	X
Theresa Boston-Ellis	CFO Marion County Schools	X	
Alice Posada	Director of Finance Marion Coutny	X	
Vickye Vaughns	Supervisor of Student Information and State Reporting	X	X
Kim Burt	Career Education Facilitator	X	
Tracey Thronhill-Parker	Program Manager, Marion Technical College	X	
Jeanette Morrison	Confidential Secretary, Marion Technical College	X	
Ashley Morgan	Coordinator, CTE	X	
Kathy Otte	Program Specialist, CTE	X	
Janet Thompson	DATA/MIS/State Reporting, Marion Technical College	X	
Desmond Williams	Senior Program Analyst, Marion Technical College	X	
Michael Kennedy	Data Processing, Marion Technical College	X	

FDOE Monitoring			
Team			
Orion Price	Program Specialist IV, Quality Assurance and Compliance	X	X
CI I D	<u> </u>		***
Chuck Davis	Program Specialist IV, Quality Assurance and		X
	Compliance		
Michael Swift	Program Specialist IV, Quality Assurance and		X
	Compliance		

Interviews

MCPS administrators were available via teleconference for interviews, if necessary.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, item F. An excess of thirty student records were checked. In addition, policies and procedures were examined and discussed at various times during the monitoring review.

VII. OBSERVATION

- **A.** <u>ADMINISTRATION</u> refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
 - The secondary, Post-secondary, and AE grants for MCPS are all co-managed by the directors of CTE and AE and Marion Technical College's (MTC) Vice-Principal Scott Carpenter.
 - MCPS has established policies and procedures required with all approval processes before any grant application is submitted to the FDOE.
 - The AE and CTE directors work in conjunction with their financial office, superintendents, advisory committees and district finance staff. The needs of the programs are discussed within monthly and quarterly meetings. Reports are sent out monthly that detail what percent of grant money has been allocated and spent as well as what is left for the year. All needs for each grant are included in the applications, which are reviewed and finally approved by the financial office before being submitted to the FDOE.
 - Once the FDOE approves the grant that is submitted, the secondary and post-secondary grants for the MCPS are tracked through Skyward® Management information system (MIS). In addition, the Adult Education grant for MTC is tracked through the FOCUS® (MIS). This allows the financial office and the CTE and AE directors to work together to track expenditures and ensure the grant is being spent on allowable, allocable, and needed for each program assigned.
 - The Comprehensive Local Needs Assessment (CLNA) is included within the MCPS grants, which requires consultation within the community and local business leaders. MCPS works directly with the Chamber of Economic Partnership (CEP) as well as stakeholders in the community. The stakeholders include business owners, teachers, and various community leaders. The business owners are the chair and vice-chair of the advisory committees which allows the programs to be shaped and developed within the needs of the local businesses. Teachers are included on the advisory committee as support personnel to ensure the information makes it from the meetings to the classroom.
 - MCPS offers multiple opportunities for district-wide training and professional development. AE, CTE and MTC administrative staff participate in annual conferences within their program areas. At the same time, FDOE sponsored training events and webinars such as the Florida Association for Career and Technical Education (FACTE) and the Workforce Educational District Data Advisory Council (WEDDAC) conferences are attended.

- MCPS has a teacher externships program, which pays teachers to work 32 hours within a local business at a set pay rate. This allows the teacher to be up to date on all terminology and new equipment used in the field, and to be a master of the program they teach within the school district.
- **B.** <u>DATA AND ASSESSMENT</u> refers to all the data and assessment system components, including test administration, test security, data collection, entry, reporting, and procedures. The use of data in program decision-making is also explored and commented.
 - MTC utilizes the Focus® system for the student information system (SIS) and MIS. The MCPS utilizes the Skyward® system for their student information system (SIS) and 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 training annually and upon initial hiring. Additionally, MTC has biweekly meetings with the creators of FOCUS®. This guarantees all training for personnel that work within the MIS is fully trained on all updates for the system in detail with the development team for the MIS.
 - All the data elements required of their local MIS were included in the MIS system and verified via screenshots during the VDMR.
 - Registration forms (digital) include the student "release of information" clauses required by the Family Educational Rights and Privacy Act (FERPA). The district and technical college submitted registration screenshots as evidence that shows the included statement.
 - The district has internal controls that ensure everyone 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.
 - Samples of AE and CTE student data were reviewed and verified for accuracy as part of the VDMR. As a result, MCPS and MTC provided all required student records that were requested. In addition, all student records were verified to be correctly entered.
 - English to speakers of other languages (ESOL) testing is entered by scan to TopsPro® as pencil and paper tests are given. A report is then pulled from TopsPro® by MTC personnel, which is uploaded into the student's folder in FOCUS®, showing what score was attained.
 - Test of Adult Basic Education (TABE) testing is conducted electronically. Once the testing is completed, the data specialist manually enters the student's test score into the Skyward® system. The student data director then double-checks the entered data before submitting information to the FDOE.
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to those elements that contribute to student learning and skill acquisition.
 - CTE students can participate in multiple Career and Technical Student Organizations (CTSO), internships, and work-based learning.
 - No reasonable services and accommodation are denied to those students who self-declared a disability. They refer to disabled students as exceptional and have a comprehensive policy and procedure to identify and cater to needs based on disability. Once the student self-identifies during registration, the school keeps forms on file from the students' professional caregiver stating the disability and required attention or accommodation.
 - AE instructors are trained to incorporate CTE skills and related content into daily classroom instruction. This is evidenced by the Teacher externships programs, as well as the annual training required.
 - MCPS has an incredibly unique enlisted, enrolled, or employed (EEE) program. Once the student decide which program they are interested in pursuing during the eighth grade, a checklist and guidance counselor is assigned quarterly checkups. The checklist is monitored

for completion of the current year's objectives as well as what will be required to be completed in future years. This is pivotal to helping the student continue along the readiness path for the post-graduation career. Each checklist differs based on what is chosen by the student.

- The district has a memorandum of understanding (MOU) with CareerSource Citrus, Levy, Marion to provide career services and training for students.
- MCPS has a dual enrollment articulation agreement with Marion Technical College. The Dual Enrollment Articulation Agreement was submitted as evidence for the college that breaks 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.
- ESOL is provided for students who are learning English for the workplace. All instructors administering tests for ESOL are certified as required by FDOE and the testing companies.
- **D.** <u>TECHNOLOGY AND EQUIPMENT</u> 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 are 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.** <u>ACCESS AND EQUITY</u> refer to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation, and completion of programs.
 - The Office of Equal Educational Opportunity (OEEO) for school districts monitors and oversees civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEO at 850-245-0511.
- **RECORDS REVIEW** refers to reviewing the records and documents that evidence compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed. Included in the review were the following:
 - 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. <u>FINANCIAL</u>** 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.
 - MCPS has multiple financial policies and procedures to follow that ensure the efficient management of Secondary, Post-Secondary, and AE grant funds. The grants are filtered through multiple levels of leadership. The process begins at the requestors level and flows in the following direction. Once a request for the purchase of an item is made and input into the MIS, the request is directed to the director of CTE or AE for approval. Once approved, the finance office looks over the validation request as well as if the money is available for the purchase within its designated object code. If money is available and the school is approved for the purchase, the Chief Financial Officer (CFO) is the destination for approval.
 - MCPS uses the Skyward® MIS, while MTC uses the FOCUS® data system to track all expenditures driven through budgets. Spreadsheets are utilized to track the progression of spending under each category to ensure spending is on track for end-of-year finalization on final expenditure reports (399/499s) to be submitted to the FDOE.
 - Program directors, finance office, and the administrative staff for MTC and MCPS meet monthly to review expenditure reports and to determine a grant's current financial standing. The report that is reviewed is broken down to the object code and school for each grant. Due to this, the school has utilized spending efficiently.
 - A grant budget analysis was conducted for MCPS for all grants from 2018-2021. The original grants and final expenditure reports matched. No discrepancies were noted.
- **H.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships, or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.
 - MCPS has multiple collaborations for articulation and MOUs within the local community.
 They often offer additional educational and job experiences to students within the district.
 The current partners are:
 - o MOU: CareerSource Citrus, Levy, Marion
 - o Articulation: Marion Technical College (MTC)

VIII. RESULTS

MCPS was not found to be out of compliance. Documentation was up to date and all information required was submitted within a reasonable period to the FDOE.

IX. SUMMARY

Once the monitoring review is completed, including receipt of the 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 corrective action plan items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

The monitoring team extends its appreciation to all participants in the Marion County Public Schools monitoring review on behalf of the department. Special thanks is offered to Scott Carpenter for his participation and leadership during this process.

APPENDIX A

Marion County Public Schools Adult Education Risk Matrix

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

Agency Name: MARION COUNTY PUBLIC SCHOOLS

Program Type: AE

Monitoring Year: 2021-2022

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points	
	7 or More Years	7				
Number of Years Since Last	5-6	5	3	V10	30	
Monitored	3-4	3	3	<u>X10</u>	30	
	0-2	1				
	Upper Quartile	7				
Total Budget for all Adult	Upper Middle	5	_			
Education Grants Combined	Lower Middle	3	5	<u>X 8</u>	40	
	Lower Quartile	1				
	4 or More	7				
	3	5	_			
Number of Adult Education Grants	2	3	3	<u>X 8</u>	24	
	1	1				
Change in Management	Yes	7	_	<u>X 6</u>	0	
Information Systems (MIS) from Previous Fiscal Year	No	0	0			
Agency AE Program Director	Yes	7	7	<u>X 6</u>	42	
Change from Previous Fiscal Year	No	0]			
	Upper Quartile	7				
Unexpended Funds from all Adult	Upper Middle	5	5	<u>X 4</u>		
Education Grants Combined	Lower Middle	3			<u>X 4</u>	20
Eddcation Grants Combined	Lower Quartile	1				
	0	0				
	Upper Quartile	7	1	<u>X 4</u>	4	
Number of Findings from the	Upper Middle	5				
Number of Findings from the Office of the Auditor General	Lower Middle	3				
Office of the Auditor General	Lower Quartile	1				
	0	0				
	Target Not Met					
	on 3 of 3	5				
	Indicators			V.6	24	
	Target Not Met					
Adult Education Program	on 2 of 3	3	4 <u>X 6</u>			
Improvement Plan (AEPIP)	Indicators			<u>x p</u>	24	
-	Target Not Met					
	on 1 of 3	1				
-	Indicators					
	All targets met	0	1			
			Agency	Risk Score	184	

Data sources used for calculations: Prior to July 1, 2020

Marion County Public Schools Career and Technical Education Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants

Agency Name: MARION COUNTY PUBLIC SCHOOLS

Program Type: CTE

Monitoring Year: 2021-2022

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7	3		
Number of Years Since Last	5-6	5	3	V 10	30
Monitored	3-4	3	3	<u>X 10</u>	30
THOMETON CO.	0-2	1			
	Upper Quartile	7			
Total Budget for all Perkins	Upper Middle	5	_	37.0	
Grants Combined	Lower Middle	3	7	<u>X8</u>	56
	Lower Quartile	1]		
	4 or More	7			40
Namehou of Doubing Guants	3	5	_	V 0	
Number of Perkins Grants	2	3	5	<u>X 8</u>	
	1	1			
Change in Management	Yes	7	0	V 6	0
Information Systems (MIS) from Previous Fiscal Year	No	0	U	<u>X 6</u>	U
Agency CTE Program Director Change from Previous Fiscal	Yes	7	7	X 6	42
Year	No	0	/	<u> </u>	42
	Upper Quartile	7			
Unexpended Funds from all	Upper Middle	5			
Perkins Grants Combined	Lower Middle	3	7 <u>X 4</u>	<u>X 4</u>	28
Perkins Grants Combined	Lower Quartile	1			
	0	0			ı
	Upper Quartile	7	1 <u>X</u>		
Number of Findings from the	Upper Middle	5			
Number of Findings from the Office of the Auditor General	Lower Middle	3		<u>X 4</u>	4
Office of the Auditor General	Lower Quartile	1			ı
	0	0			

<u>Data sources used for calculations:</u> Prior to July 1, 2020

Please address inquiries regarding this report to:

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