Quality Assurance and Compliance
Virtual Desk Monitoring Review

for

Adult Education and Career and Technical Education

The School District of Lee County

October 11 – 26, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

The School District of Lee County
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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 are 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 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.

The School District of Lee County's (SDLC) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). A notification letter was sent to Dr. Kenneth Savage, Superintendent, on July 14, 2021. The designated representative for the agency was Ms. Rita Davis, Director of Adult and Career Education.

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

V.   THE SCHOOL DISTRICT OF LEE COUNTY

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at a program level): Post-secondary – 56,134
AE- 5,468

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

Finance
FY 2018-19

Grants	Grant Number	Grant Amount	Unexpended
Secondary	360-1619B-9CS01	$1,035,693.00	$29,694.21
Post secondary	360-1619B-9CP01	$250,035.00	$9,015.16
Adult Education	360-1919B-9CG01	$991,174.00	$0.00

FY 2019-20

Grants	Grant Number	Grant Amount	Unexpended
Secondary	360-1610B-0CS01	$1,037,673.00	$34,233.20
Post secondary	360-1610B-0CP01	$328,981.00	$40,494.00
Adult Education	360-1910B-0CG01	$991,174.00	$65,752.11

FY 2020-21

Grants	Grant Number	Grant Amount	Unexpended
Secondary	360-1611B-1CS01	$934,339.00	N/A
Post secondary	360-1611B-1CP01	$315,598.00	N/A
Adult Education	360-1611B-1CG01	$991,174.00	N/A
CARES Act	360-1230A-1CR01	$367,492.00	N/A

Additional information about the provider may be found at the following web address:
https://www.leeschools.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 the SDLC was conducted on October 11, 2021. The exit conference was conducted on October 26, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Matt Acosta	Business Services Coordinator	X	X
Richard Aviles	Applications Manager	X	
Rita Davis	Director of Adult and Career Education	X	X
Darryl Eldon	Director of Application Services	X	
Todd Everly	Sr. Director of Technical Colleges	X	X
Brian Granstra	Coordinator Adult and Career Education	X	X
Kelly Letcher	Director of Budgets	X	
Charles Pease	Director Cape Coral Tech College	X	X
John Roszell	Director Fort Myers Technical College	X	X
Gina Sabiston	Associate Director Cape Coral Tech College	X	X
Catherine Scoville	Associate Director Fort Myers Tech College	X	X
FDOE Monitoring Team			
Orion Price	Program Specialist IV, Quality Assurance and Compliance	X	X
Chuck Davis	Program Specialist IV, Quality Assurance and Compliance	X	X

Michael Swift	Program Specialist IV, Quality Assurance and Compliance	X	

Interviews
SDLC 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. **ADMINISTRATION** 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 SDLC are all co-managed by the director of CTE and AE, Ms. Rita Davis, the secondary and adult education grants specialist, Karen Pikula, The senior director of both technical colleges, Todd Everly, and the finance office.
- The district has established policies and procedures required with all approval processes before any grant application is submitted to the FDOE.
- The AE and CTE director works in conjunction with the financial office, superintendents, advisory committees and district finance staff. This is considered the grant consultant team. The needs of the district programs are discussed within these monthly 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 adult education, secondary and post-secondary grants for SDLC are tracked through the PeopleSoft® management information system (MIS). This gives the financial office, Rita Davis and both technical colleges the chance to work together to track all expenditures. In turn, it helps ensure the grant is being spent on items deemed allowable, allocable and needed for each program assigned. To accomplish this, the grant consultant team meets monthly with budget spreadsheets that detail overages, while discussing the remaining money within the budget scope.
- The Comprehensive Local Needs Assessment (CLNA) is included within the SDLC grant submittals to the FDOE which require consultation within the community and local business leaders. The SDLC works directly with business owners and stakeholders in the community. The stakeholders include business owners, teachers, and various community leaders throughout Lee County. The business owners are all a part of the district advisory committees which allows the programs to be shaped and developed in the needs of local businesses. Staff from the schools are included in the advisory meetings as well so the information makes it to the classroom.
- SDLC offers multiple opportunities for district-wide training and professional development. AE, CTE and the technical college administrative staff participate in annual conferences within their designated 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.

B. **DATA AND ASSESSMENT** 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 on.

- SDLC utilizes the FOCUS® system for the 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.
- Data elements necessary for their local MIS were included in the MIS system and verified via screenshots during the VDMR.
- Digital registration forms 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.
- English for speakers of other languages (ESOL) testing is computer-based. A report is then pulled from TopsPro® by SDLC personnel, which is uploaded into the student's folder in FOUCS®, showing what score was attained and the date the test was taken.
- Test of Adult Basic Education (TABE) and Comprehensive Adult Student Assessment System (CASAS) testing is conducted electronically. The test proctors are certified by TABE, CASAS, and the FDOE. Once the student completes the test, the data specialist manually enters the student's test score into the FOCUS® system. The student data director then double-checks the entered data before submitting information to the FDOE.
- SDLC is currently on a Corrective Action Plan (CAP) with FDOE's DCAE Bureau of Budget, Accountability and Assessment, Office of Research and Evaluation. The CAP is due to incorrect data submission during the 2019-20 reporting year. Adult general education instructional hours were significantly underreported by the agency

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

- CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), internships and other work-based learning.
- No reasonable services and accommodations 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 accommodations.
- 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.
- The district has a memorandum of understanding (MOU) with CareerSource Southwest Florida to provide career services and training for students.
- SDLC has a dual enrollment articulation agreement with Cape Coral and Ft. Myers Technical Colleges. The Dual Enrollment Articulation Agreement was submitted as evidence for the college that breaks down requirements for students to participate.
- English for Speakers of Other Languages, or ESOL, is provided for students who are learning English to help in the workplace. All instructors administering tests for ESOL 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 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.   **ACCESS AND EQUITY** refers 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 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 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.   **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.

- SDLC 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 various levels of leadership. The process begins at the requestor's level and flows in the following chain of command: first, a request for the purchase of an item is made and input into the MIS. Next, 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 Funds are available for purchase within its designated object code. If money is available and the school is approved for the purchase, the Chief Financial Officer (CFO) will be the final approver in the chain.
- SDLC uses the PeopleSoft® MIS data system to track all expenditures driven through budgets throughout the fiscal year. 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 (DOE 399/499s) to be submitted to the FDOE.

- SDLC utilizes purchasing cards. Supervisors are the cardholders, and cards are used for specific purposes which include but are not limited to:
  - Hotel Reservations
  - Holding place for training and conferences for faculty
  - Online purchase through Amazon or related affiliates.

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.

- SDLC 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:
  - MOU: CareerSource Southwest Florida
  - Articulation: Cape Coral Technical College (CCTC), Ft. Myers Technical College

VIII. RESULTS

Finding Number	1
Area	Financial
Finding Summary	A grant budget analysis (GBA) was conducted for SDLC for all grants from 2018-2021. There were multiple errors, including overspending, money approved but not spent, and new object codes added to the final expenditure 399 reports. The object codes found were spread across multiple years and did not match after amendments were submitted.

Finding Detail	The following object codes were identified:
	• Fiscal Year (FY) 2018-19
	  ▪ Secondary:
	    • Object codes 642 ($78,766); 648 ($93,576.80); 649 ($91,724.22) and 792 (34,282.21) were all overspent with no budget amendments submitted.
	  ▪ Post-secondary:
	    • Object codes 369 ($8,750); 341 ($14,206.81); 644 ($14,642.87) and 732 ($3,008.00) were all overspent with no budget amendments submitted.
	  ▪ Adult
	    • Object Codes 100 ($151,555.32); 144 ($61,775.52) and 166 ($28,685.07) were all overspent with no budget amendments submitted.
	    • Object Codes 330; 360; 519; 642; 731 and 732 were previously approved on the original grant but funds moved to other object codes for final expenditures in other object codes without amendments submitted.
	• FY 2019-20
	  ▪ Secondary:
	    • Object codes 369 ($14,475.15); 520 ($25,400.47); 529 ($11,161.49) and 642 (120,433.33) were all overspent with no budget amendments submitted.
	    • Object Codes 390; 450; 460; 649; 731; 750 and 792 all had expenditures but no approval on the original grant and no amendments for final expenditures.
	    • Object codes 120; 330; 730 and 791 were all approved on the original grant but funds moved to other object codes with no amendment submitted.

Citation	Violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."
Recommended/ Anticipated Corrective Action	The Executive Director has provided a memo of attestation stating the district accepts the finding.
Anticipated completion date:	12/08/2021
Name(s) and Title(s) responsible for corrective action:	Ms. Rita Davis Executive Director of Adult Education and Career and Technical Education.
Plan accepted by: Orion Price	**Date: 12/8/2021**
Status of Action Plan (to be completed by FDOE staff)	
Status of CAP: Closed	**Date:12/08/2021**

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 SDLC monitoring review on behalf of the department. Special thanks are offered to Rita Davis for her participation and leadership during this process.

The School District of Lee County
Adult Education
Risk Matrix

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

Agency Name: The School District of Lee County
Program Type: **AE**
Monitoring Year: **2021-2022**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	**5**	X10	**50**
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	**7**	X 8	**56**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	**3**	X 8	**24**
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	**0**	X 6	**0**
	No	0			
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	**0**	X 6	**0**
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	**7**	X 4	**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	**1**	X 4	**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	**3**	X 6	**18**
	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	**180**

Data sources used for calculations: Before July 1, 2020

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

Agency Name: The School District of Lee County
Program Type: **CTE**
Monitoring Year: **2021-2022**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	5	X 10	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	7	X8	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	3	X 8	24
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	7	X 4	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	1	X 4	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
				AGENCY RISK SCORE:	**162**

Data sources used for calculations: Before July 1, 2020

PERSONAL | PASSIONATE | PROGRESSIVE

THE SCHOOL DISTRICT OF LEE COUNTY
CTE & Adult Education VDMR, Fall 2021
District Highlights

Adult Education
- Completely online registration for GED preparation and English literacy classes for10 physical locations and 1 online site
- Integrated Education & Training program with Adult Ed, technical colleges andLee Health
- Pathways to Career Opportunities Grant recipient for IT apprenticeship program
- Agency partner with HUD, Abuse Counseling & Treatment Center, and OurMother's Home to improve community outcomes

Career & Technical Education (Grades 5-12)
- Published article in local newspaper, July 2021 (https://www.yumpu.com/en/document/read/65747686/east-lee-county-news-july-2021/2)
- 4,695 industry certifications and digital tools certificates earned in FY21
- 48.84% of graduating seniors in 2020 earned at least one industry certification
- 33,732 CTE course enrollments (as of 9/23/21)
- FY22 – EXCEL (EXcellent Career Exploration Lab) Bus to visit grade 5 studentsthroughout the district for career exploration experiences
- FY22 - implementing Transeo web application that allows businesses to connectwith high school students for work-based learning experiences

Cape Coral Technical College
- **Council on Occupational Education Accreditation Reaffirmation** – After an extensive year-long review process and team visit, CCTC's accreditation wasreauthorized in September 2021 for the maximum possible timeframe through2026.
- **Top Program Ranking** – CCTC's Practical Nursing program is currently ranked #2 out of 91 programs evaluated in Florida for 2021 by PracticalNursing.org.

- **Expanding to Meet Regional Demand** – The School District of Lee County's five- year Capital Improvement Plan currently includes $14.6 million for planning andconstruction of an Auto & Marine program building (Phase 1) as well as a separate building to house 8 additional skilled trades and professional programs(Phase 2) on CCTC's current property.

- **Student Financial Assistance During the Pandemic** – Nearly all students receivedsignificant emergency financial assistance that enabled them to continue their education thanks to the Higher Education Emergency Relief Funds 1, 2, and 3; more than $600,000 has been distributed to-date.

- **Rapid Credentialing Scholarships** – In 2020 and 2021, approximately 40 CCTCNursing Assistant students received full scholarships thanks to Florida's Rapid Credentialing grant and matching grant funds.

- **Job Placement and Licensure Rates** – For the 2020 accreditation reporting calendar year, CCTC's job placement rate (in field of study) across all programswas 92% and the licensure exam pass rate (for programs requiring state licensure) was 99%.

Fort Myers Technical College

- **Campus Remodel Project** – $10 million remodel is underway and set to breakground in February of 2022.

- **New Branding and Core Values** – Adopted by FMTC in August of 2021.
  - New Tag Line - "Real Training - Real People - Real Work!"
  - Core Values - Accountability, High Expectations, Innovation, Integrity,Professionalism

- **Student Financial Assistance During the Pandemic** – Just under one million dollarshas been distributed to-date to students from the Higher Education Emergency Relief Funds 1, 2, and 3.

- **Job Placement and Licensure Rates** – FMTC's overall job placement rate (in fieldof study) was 90% and overall licensure exam pass rate was 95% for the 2020 accreditation reporting calendar year.

- **Annex Campus Exploration** – Due to enrollment demands and job growth, FMTCis exploring options with the support of district leadership to expand program offerings through an annex campus within the next five years.

Southwest Florida Public Service Academy

- **Academy Profile** – The Southwest Florida Public Service Academy is comprised offour basic recruit training courses. The academy's main campus sits on 20 acres and has 13 buildings. There are also 7 satellite sites that are under the authority ofthe academy where training is conducted with our area law enforcement agencies and basic recruit classes throughout Southwest Florida.
  - During a calendar year the Academy conducts (8) Basic lawEnforcement and (2) Basic Firefighter & Emergency Medical Technician programs to meet community employer needs.

- **Program Recertifications** – the Public Service Academy was successfully awarded their recertification certificate in 2021 by the Florida Department of Law Enforcement Criminal Justice Standards & Training and received a perfectscore for a Type-A Certificate. Additionally, the Public Service Academy was awarded their

recertification certificate by the Division of State Fire Marshall, Bureau of Fire Standards & Training and their recertification certificate by the Florida Department of Health for their Emergency Medical Technician program.

- **Rapid Credentialing Scholarships** – In the 2020-21 school year, approximately 24firefighter students received full scholarships thanks to Florida's Rapid Credentialing grant.
- **Expansion Opportunities** – The School district of Lee County has committed tomoving the Academy to the current Fort Myers Technical College site once anew FMTC annex campus is completed. This would give the Academy the needed space for program growth to meet the employment needs of our community partners.
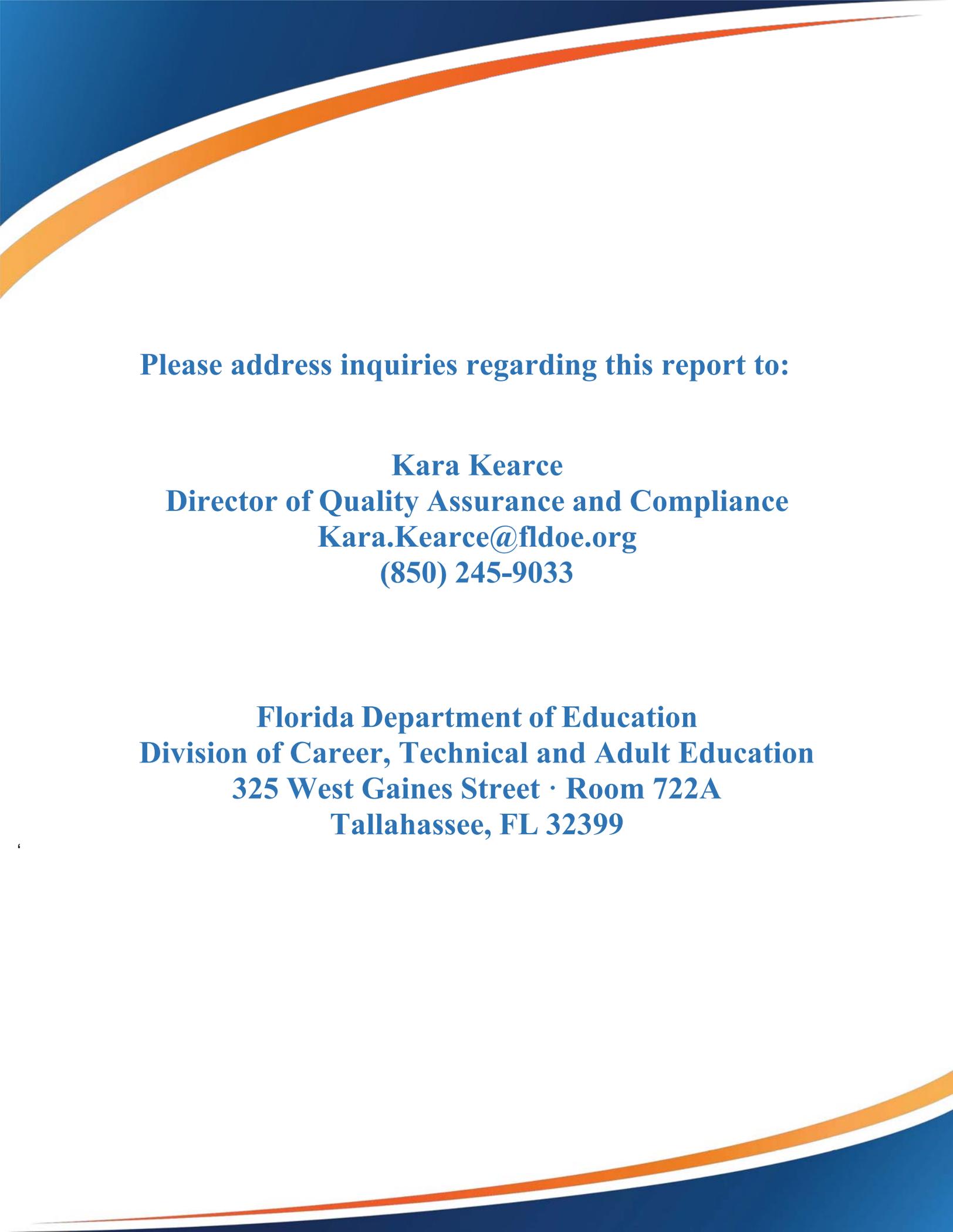
Please address inquiries regarding this report to:

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