



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

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

**Nassau County School District**

**March 29-31, 2023**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education  
**Nassau 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 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 on a regular basis.

## **II. AUTHORITY**

The FDOE receives federal funding from the U.S. Department of Education (USED) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act, and for Adult Education (AE) under the Workforce Innovation and Opportunity Act (WIOA) of 2014. FDOE awards sub-grants to eligible providers to administer local programs. FDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for CTE and Adult Education/Family Literacy. Each state shall have procedures for reviewing and approving applications for sub-grants and amendments to those applications, for providing technical assistance, for evaluating projects and for performing other administrative responsibilities the state has determined are necessary to ensure compliance with applicable statutes and regulations pursuant to 34 CFR 76.770, Education Department General Administrative Regulations (EDGAR) and the Uniform Grant Guidance (UGG) for grant awards issued on or after December 26, 2014. The Florida Department of Education, Division of Career and Adult Education, is required to oversee the performance of sub-grantees in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes).

## **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 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 Nassau County School District (NCSD) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Dr. Kathy Burns, superintendent, on November 21, 2022. The designated representative for the agency was Tammy Johnson (AE and CTE). The division's representative conducting the OSMR was program specialist Charles Davis, of the Quality Assurance and Compliance section.

**V. Nassau County School District**

**ENROLLMENT:**

CTE (possible duplication at program level): Secondary – 4,569;  
 AE – 275

**Finance**

The provider was awarded the following grants for fiscal years (FY) 2019-2020, 2020-21 and 2021-22:

**FY 2019-20**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	450-1610B-0CS01	\$ 101,107.00	\$ .00
Perkins Rural	450-1610B-0CR01	\$ 64,850.00	\$ 1,091.12
Adult Education - AGE	450-1910B-0CG01	\$ 108,341.00	\$ 2,098.48
Adult Education – Corrections	450-1910B-0CC01	\$ 87,624.00	\$ 736.93

**FY 2020-21**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	450-1611B-1CS01	\$ 105,821.00	\$ 549.15
Perkins Rural	450-1611B-1CR01	\$ 50,593.00	\$ 1,588.98
Adult Education - AGE	450-1911B-1CG01	\$ 108,341.00	\$ 9,049.02
Adult Education - Corrections	450-1911B-1CC01	\$ 87,624.00	\$ 68,922.98

**FY 2021-2022**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	450-1612B-2CS01	\$ 109,341.00	\$ .00
Perkins Rural	450-1612B-2CR01	\$ 49,810.00	\$ 1,633.70
Adult Education – AGE	450-1912B-2CG01	\$ 164,547.00	\$ 26,879.77

Additional information about the provider may be found at the following web address:  
<https://www.nassau.k12.fl.us/>

## VI. MONITORING ACTIVITIES

The monitoring activities included pre-and post-review planning, an entrance and exit meeting, records review, and interviews with administrators, if necessary. Inventory reviews are also conducted when onsite with a provider.

### Onsite Visits

The monitoring team visited the following sites as part of the OSMR:

- Fernandina Beach High School
- Hilliard Adult Education Center
- Nassau Adult and Career Center
- Nassau Community Academy
- NCCFEC/ Full-Service School
- West Nassau High School

### Entrance and Exit Conferences

The entrance conference for NCSD was conducted on March 29, 2023. The exit conference was conducted on March 31, 2023. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Tammy Johnson	CTE and AE Director	x	x
Edward Brown	Principal Nassau Adult and Career Center	x	x
<b>FDOE Monitoring Team</b>			
Michael Swift	Program Specialist, QAC, FDOE	x	x
Charles Davis	Program Specialist, QAC, FDOE	x	x

### Interviews

No interviews were required as part of the OSMR. NCSD submitted thorough and qualitative documentation and records via the FDOE ShareFile.

### Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, section F. A minimum of 40 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.

- As part of the required comprehensive local needs assessment (CLNA), Secondary CTE administrative staff consulted with numerous individuals and entities across the Nassau County service area. Representatives from special population groups also provided insight into the workforce needs and opportunities for those students. The list of stakeholders includes, but is not limited to:

- Amelia-Island/Nassau County Chamber of Commerce
- Nassau County Economic Development Board
- CareerSource of Northeast Florida
- District staff, faculty, students, and administrators
- Florida State College at Jacksonville
- JaxUSA
- Local apprenticeship groups (private and public)
- New Teacher Training (three day face to face session) is offered with first-year teachers designed to offer them support with District resources, student engagement strategies, behavior management techniques, access to instructional coaches and ethics training. All first year teachers are paired with an experienced mentor teacher at their school site as well as a content area specialist that visits bi-weekly to assist with common planning and other areas of need. Teachers that are working with a temporary certificate are provided a mentor teacher to assist them with completing their PEC portfolio and other requirements necessary to obtain a professional certificate. Teachers that wish to add a subject area to their certificate have access to district purchased study materials at no cost to them. The Professional Development department offers the following endorsement programs free to teachers in the district to allow them to meet certification requirements - Reading, English to Speakers of Other Languages (ESOL), and Autism Spectrum Disorder (ASD).
- The district conducts ongoing professional development and training to ensure all CTE and AE administrative staff are up to date on any changes that come from the federal and/or state level Department of Education. FDOE sponsored training events are also attended. NCS D also provided documentation supporting district-wide instructional training and professional development.
- In compliance with the Improving America's Schools Act of 1994, Nassau County Adult Education ensures equitable access to, and equitable participation in Adult Education for students, teachers, and other program beneficiaries with special needs. Barriers such as gender, race, national origin, color, disability, or age do NOT impede equitable access participation. Steps to ensure equitable access include marketing to all eligible participants, a non-discriminatory admissions process, and specific outreach to underserved groups. The NCS D has developed policies concerning student privacy, parental access to information, and other specific requirements of the General Education Provisions Act.
- The School Board adopted the records retention schedules published by the Florida Department of State, Division of Library and Information Services, Bureau of archives and Records Management as set forth in publications including but not limited to GS1-SL, and GS7 as amended from time to time and the district adheres to the State retention policy.

**B. DATA AND ASSESSMENT** refer 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.

- NCS D currently utilizes FOCUS® as their management information system (MIS) and student information system (SIS) to house and track AE and CTE student data such as records, grades and attendance.
- Policies and procedures on data collection, entry and verification were provided by the district as part of the monitoring process. Policies and procedures were also provided in regard to full-time equivalent (FTE) survey reports submitted to FDOE. Those student survey

- reports are used to ensure the accuracy of data reports submitted to FDOE, and the reconciliation of error reports they may receive from the state.
- NCSO conducts extensive and ongoing training for all individuals who have access to student data. Those individuals also participate in FDOE-sponsored training events such as quarterly webinars for AE and CTE, Workforce Education and District Data Advisory Council (WEDDAC) meetings, Florida Association of Management Information Systems (FAMIS) and workforce development information system (WDIS) conferences. Local, district-wide training also takes place as needed.
  - All proctors of the Tests for Adult Basic Education (TABE) and the Comprehensive Adult Student Assessment System (CASAS) are trained and certified, as required, by the state and the appropriate testing companies. Testing certificates were provided as evidence.
  - NCSO submitted a “Collection of Data Elements” attestation stating that all required elements of their local MIS are in place. The district follows the WDIS handbook for all data elements.
  - Student registration packets include confidential medical disclosures (for students with disabilities) and student directory information opt-out forms as required by the Family Educational Rights and Privacy Act (FERPA). All collected student data and information is provided in the aforementioned student registration packet.
  - All AGE students who receive 12 hours or more of instruction and are supported by federal funds are required to be pre- and post-tested with the TABE. Students must be tested within the first 12 hours of instruction. The exception is students who are not required to be post-tested for the final Literacy Completion Point (LCP) because the student earns the General Education Diploma (GED) ®. TABE Post Testing is administered after 50-60 hours of classroom instruction.
  - Samples of CTE and AE student data were reviewed and verified for accuracy as part of the OSMR. All student records provided by NCSO were compliant with reported student data. Records reviewed included:
    - AGE completers (literacy completion points) See Finding 1
    - Secondary CTE industry certifications

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

- NCSO offers many CTE and AE programs throughout their service area.
  - Adult Basic Education (ABE) and Integrated English Literacy and Civics Education (IELCE) classes at The Center for Adult and Community Education Center.
  - Adult Education programs are also offered at the county correctional facility.
  - Postsecondary Dual Enrollment opportunities are offered at Florida State College at Jacksonville and University of North Florida, in addition to Secondary programs being offered at Hilliard Middle School, Fernandina Beach High School and West Nassau High School.
- The NCSO Yulee High School Automotive Maintenance and Light Repair program is Automotive Service Excellence (ASE) certified through 2023.
- CareerSource industry sector managers participate on CTE program advisory boards and work directly with the career education department to participate in decisions related to program offerings, course activities, and vendor selection on related items.
- CareerSource is also a partner with the Junior Achievement Inspire program that Nassau County adopted in 2021-22 as a comprehensive career exploration program.
- NCSO CTE Labor Market Alignment of all CTE programs was conducted using the Statewide and Regional Occupations Lists provided by the DOE CTE

department. The primary and secondary Standard Occupational Classification (SOC) Codes provided in the curriculum frameworks for each program were compared to the Demand Occupational Letter (DOL). The Digital Media/Multimedia Design program was supported by letters of support issued by the Economic Development Agency and Local Chamber of Commerce. After examining their CLNA and labor market alignment, the following critical needs were identified:

- Nursing Assistant, Nursing, and other Healthcare
- Construction and related trades
- IT – Networking, Software and Web Development, and cybersecurity
- Service, Retail, and most Entry-level positions
- Special populations are encouraged to enroll in career education programs and receive accommodations and/or modifications as appropriate to place them in the least restrictive environment. The district also offers Project Search, a program led by the Nassau exceptional student education (ESE) Department, that places special population students into summer internships. Finally, ESE students participate alongside all Nassau County CTE students in the district's Reverse Job Fair, which matches employers to trained students. The district places a great deal of effort into recruiting non-traditional students into its CTE programs. Non-traditional students are featured in recruitment materials and encouraged to follow-through from programs to specific career opportunities. CTE teachers work with ESE teachers and school administration to ensure equal access and to work with individual education plan (IEP) teams to remove barriers for students.
- Students also participate in Career and Technical Student Organizations (CTSO) which allow students to practice skills learned in the classroom via local, state and national competitions, and gain invaluable leadership experience from opportunities to serve as chapter and regional officers.
- The monitoring team ensured appropriate programmatic links between the Secondary programs of study submitted to FDOE and the corresponding Postsecondary program Florida State College at Jacksonville. Various other district articulation agreements were reviewed and verified for the appropriate Secondary to Postsecondary linkage.
- In accordance with WIOA, NCSd has a memorandum of understanding (MOU) with CareerSource Northeast Florida to provide workforce training, employment assistance and other services for those interested in workforce programs and/or literacy services.
- AE and CTE instructors participate in ongoing trainings provided by FDOE, as well as annual professional development through the district. Instructors also participate in program-specific training and certification programs
- No reasonable services and accommodations are denied to those students who self-declare a disability

**D. TECHNOLOGY AND EQUIPMENT** refer to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.

- All inventory criteria set forth by federal, state and local guidelines are included within the inventory management system.
- The district has policies and procedures on property management, equipment safety/storage, inventory reconciliation and inventory disposal.
- NCSd conducts inventory once per fiscal year of all capital assets over \$5,000. After completing the inventory, the principal files with the district office.



- Any capital assets discovered to be lost or stolen are immediately reported by the Property Manager to Property Control Coordinator and a police report is obtained. There have not been any reported losses during the reviewed grant years.
- NCSD has internal controls to govern loss prevention, transfer of property and the disposal of capital assets.
- As part of the OSMR the QAC team conducted inventory searches at six locations across the district. No issues were uncovered at the time of the inventory review.

**E. ACCESS AND EQUITY** refer to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation, and completion of programs.

- The Office of Equal Educational Opportunity (OEEEO) 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 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.

Items reviewed during the OSMR included, but were not limited to:

- District policies and procedures for data collection, verification and reporting
- District policies and procedures for finance and procurement
- District policies and procedures for property management
- CLNA w/supporting documents
- CLNA advisory committee records and stake holder records
- Inventory records
- Procurement records
- Exceptional Student Education manual
- 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.
- CTE and AE student data review
- TABE and CASAS proctor records

**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.

- Skyward® is used as the district's enterprise resource planning (ERP) and financial management system. It is also used to house contractual bids and track payments for vendors.
- The district's finance department ensures the efficient management of CTE and AE grant funds. The following components of their financial policies and procedures manual were reviewed:
  - Budget Implementation
  - Cash Management
  - Methods of accounting
  - Fiscal internal controls
  - Records and reporting

- Inventory management
- Procurement
- Conflict of interests
- Temporary duty assignment (travel) – NCSO uses federal guidelines for travel-related expenditures such as mileage rates, per diem and food allowances.
- The district does not use purchasing cards specifically for grant funds.
- NCSO provided additional fiscal records such as time and effort reports, procurement records and travel records. All documents were in accordance with applicable local, state and federal law.

**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.

- NCSO has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within the district. The list of partners includes, but is not limited to:
  - FSCJ (Articulation and Dual Enrollment)
  - CareerSource of Northeast Florida
  - Florida Machine Works
  - VyStar Credit Union

**VIII. RESULTS**

NCSO was found to be out of compliance due to the following. .

<b>Finding Number</b>	1
<b>Area</b>	AE Student Data Reporting
<b>Finding Summary</b>	Student Data was reported incorrectly to the state.
<b>Finding Detail</b>	The monitoring team uncovered a single instance of a student being reported as having earned a learning completion point (LCP), but testing transcripts show that the student did not meet the necessary requirements to earn the reported LCP.
<b>Citation</b>	Violation of UGG 2 CFR 200.328 "Monitoring and reporting program performance."
<b>Recommended/ Anticipated Corrective Action</b>	The provider will provide a letter of attestation stating the District understands and accepts the finding.
<b>Anticipated completion date:</b>	4/24/23

<b>Name(s) and Title(s) responsible for corrective action:</b>	Tammy Johnson, Director
<b>Plan accepted by: Chuck Davis                      Date: 4/24/23</b>	
<b>Status of Action Plan (to be completed by FDOE staff)</b>  <b>Status of CAP: Complete    Date: 4/24/23</b>	

**IX. SUMMARY**

Once the monitoring review 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’s 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 of the Nassau County School District monitoring review on behalf of the department. Special thanks are offered to Ms. Tammy Johnson for her participation and leadership during this process.

**APPENDIX A**  
 Nassau County School District  
 Career and Technical Education  
 Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants</b>					
Agency Name: <b>Nassau County School District</b>					
Program Type: <b>CTE</b>					
Monitoring Year: <b>2022-2023</b>					
<b>Metric</b>	<b>Scaling</b>	<b>Point Value</b>	<b>Points Assigned</b>	<b>Weight</b>	<b>Total Metric Points</b>
<b>Number of Years Since Last Monitored</b>	7 or More Years	7	<b>3</b>	<u>X 10</u>	<b>30</b>
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Perkins Grants Combined</b>	Upper Quartile	7	<b>1</b>	<u>X 8</u>	<b>8</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Perkins Grants</b>	4 or More	7	<b>5</b>	<u>X 8</u>	<b>40</b>
	3	5			
	2	3			
	1	1			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	<b>7</b>	<u>X 6</u>	<b>42</b>
	No	0			
<b>Agency CTE Program Director Change from Previous Fiscal Year</b>	Yes	7	<b>7</b>	<u>X 6</u>	<b>42</b>
	No	0			
<b>Unexpended Funds from all Perkins Grants Combined</b>	Upper Quartile	7	<b>3</b>	<u>X 4</u>	<b>12</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Number of Findings from the Office of the Auditor General</b>	Upper Quartile	7	<b>0</b>	<u>X 4</u>	<b>0</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>174</b>

Data sources used for calculations: Prior to July 1, 2021

Nassau County School District  
Adult Education  
Risk Matrix

<b>Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants</b>					
Agency Name: Nassau County School District					
Program Type: AE					
Monitoring Year: 2022-2023					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
<b>Number of Years Since Last Monitored</b>	7 or More Years	7	<b>3</b>	<u>X10</u>	<b>30</b>
	5-6	5			
	3-4	3			
	0-2	1			
<b>Total Budget for all Adult Education Grants Combined</b>	Upper Quartile	7	<b>3</b>	<u>X 8</u>	<b>24</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Adult Education Grants</b>	4 or More	7	<b>3</b>	<u>X 8</u>	<b>24</b>
	3	5			
	2	3			
	1	1			
<b>Change in Management Information Systems (MIS) from Previous Fiscal Year</b>	Yes	7	<b>7</b>	<u>X 6</u>	<b>42</b>
	No	0			
<b>Agency AE Program Director Change from Previous Fiscal Year</b>	Yes	7	<b>7</b>	<u>X 6</u>	<b>42</b>
	No	0			
<b>Unexpended Funds from all Adult Education Grants Combined</b>	Upper Quartile	7	<b>7</b>	<u>X 4</u>	<b>28</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Number of Findings from the Office of the Auditor General</b>	Upper Quartile	7	<b>0</b>	<u>X 4</u>	<b>0</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>Adult Education Program Improvement Plan (AEPiP)</b>	Target Not Met on 3 of 3 Indicators	5	<b>3</b>	<u>X 6</u>	<b>18</b>
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
<b>Agency Risk Score</b>					<b>208</b>

Data sources used for calculations: Prior to July 1, 2021



**Please address inquiries regarding this report to:**

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