



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

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

**Palm Beach State College**

**April - June 2024**

**Final Report**

## TABLE OF CONTENTS

I.	Introduction .....	1
II.	Authority .....	1
III.	QAC Core Monitoring Guide.....	1
IV.	Provider Selection .....	1
V.	Palm Beach State College .....	2
VI.	Monitoring Activities .....	2
VII.	Observation .....	3
VIII.	Results .....	7
IX.	Summary .....	7
	Appendix A.....	9

Florida Department of Education  
Division of Career and Adult Education  
**Palm Beach State College**  
**Perkins Career and Technical Education**  
**Quality Assurance and Compliance Monitoring Report**

## **I. INTRODUCTION**

The Division of Career and Adult Education (Division) within the Florida Department of Education (Department) has several key responsibilities, including leadership, resource allocation, technical assistance, monitoring and evaluation. These duties require the Division to oversee the performance and regulatory compliance of federal and state funding recipients. The Quality Assurance and Compliance (QAC) office plays a critical role in this process by designing, developing, implementing and evaluating a comprehensive quality assurance system, which includes monitoring. This system aims to ensure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is the Division's duty to regularly monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

## **II. AUTHORITY**

The Department receives federal funding from the U.S. Department of Education for Career and Technical Education under the Carl D. Perkins Strengthening Career and Technical Education (CTE) for the 21<sup>st</sup> Century Act and for Adult Education (AE) under the Workforce Innovation and Opportunity Act (WIOA) of 2014. The Department awards sub-grants to eligible providers to administer local programs. The Department 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 Code of Federal Regulations 76.770, Education Department General Administrative Regulations and the Uniform Grant Guidance 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 is designed to be utilized by any reviewer who is conducting an onsite or desk monitoring of any program currently administered by the Division. The guide includes a brief overview of each aspect of the monitoring design and the process, as well as objectives that can be used when agencies are monitored or reviewed. You can find the guide on the Division's website at <http://fldoe.org/academics/career-adult-edu/compliance>. The QAC office may apply any specific monitoring strategy to any federal or state-funded provider at any time. Some circumstances may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

## **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 office 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 Palm Beach State College (PBSC) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to President Ava Parker, on November 15, 2023. The designated representative for the agency was Mr. Daniel Alvarez, Perkins Grant Manager.

The Division's representative conducting the OSMR was Program Specialist Michael Swift of the QAC.

## V. PALM BEACH STATE COLLEGE

### Finance

The provider was awarded the following grants for fiscal years (FY) 2020-21, 2021-22 and 2022-23:

#### **FY 2020-21**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Postsecondary	502-1611B-1CP01	\$ 1,101,509.00	\$ 124,935.71

#### **FY 2021-22**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Postsecondary	502-1612B-2CP01	\$ 1,082,099.00	\$ 12,450.24

#### **FY 2022-23**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Postsecondary	502-1613B-3CP01	\$ 1,057,639.00	\$ 227,451.80

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

<https://www.palmbeachstate.edu/>

## 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.

### Onsite Visits

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

- PBSC – Lake Worth Campus
- PBSC – Palm Beach Gardens Campus

### Entrance and Exit Conferences

The entrance conference for PBSC was conducted on April 23, 2024. The exit teleconference was conducted on June 13, 2024. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Daniel Alvarez	Grant Manager, Perkins, PBSC	X	X

Kimberly Lea	Dean, Workforce Education and Development, PBSC	X	
<b>Division Monitoring Team</b>			
Michael Swift	Program Specialist, QAC	X	X
Chuck Davis	Program Specialist, QAC	X	

Interviews

No interviews were conducted as part of the OSMR. PBSC submitted thorough and qualitative documentation and evidence to support the QAC Core Activities.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, part F. A minimum of 30 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 PBSC CTE grant is managed by a knowledgeable team of administrators with numerous years of experience within their respective program areas and postsecondary education. Additionally, the program managers and coordinators are responsible for ensuring compliance with the specific laws, terms and conditions of the federal award.
- The Division grant manager for PBSC reported that grant applications and amendments are routinely submitted on time and typically require little to no additional guidance. If revisions are needed, the program director submits those in a prompt manner.
- As part of the required comprehensive local needs assessment (CLNA), PBSC postsecondary CTE administrators consulted with numerous individuals and entities across their service area. Representatives from stakeholder groups also provided insight into the workforce needs and opportunities for special student population students, as defined under WIOA. The list of stakeholders includes, but is not limited to:
  - CareerSource Palm Beach County and The Business Development Board of Palm Beach County – Representatives of local workforce board
  - Palm Beach County School District (PBCSD) – Local secondary educational agency representative
  - PBSC faculty and staff – Postsecondary representatives
  - Multiple social service agencies – Special populations
  - Center for Student Accessibility – Individuals with disabilities representative
  - Multiple Charitable Organizations – Out-of-school youth, homeless children and youth, at-risk
  - Local business owners (private and public)
  - Students
- PBSC Business Partnership Councils (BPC) also meet regularly with CTE administrators to aid in long-term planning, curriculum development and employment forecasting. In addition to serving in an advisory capacity, the councils also provides input during the CLNA process. All BPCs meet multiple times throughout the school year.
- In addition to their Labor Market Analysis (LMA), PBSC also received multiple letters of support from numerous public entities that spoke of the need for some programs represented

in their CLNA. These letters of support represent programs that aren't included on the local or state-wide occupation demands lists.

- PBSC conducts ongoing professional learning 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. Department-sponsored training events are also attended. PBSC provided multiple records of training and learning events.

**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.

- PBSC utilizes Workday® as its integrated Management Information System (MIS) and student information system. The MIS meets all Department requirements as defined by the Data Dictionary.
- PBSC has written procedures for the collection, verification, analysis and reporting of student data. The Florida College System Data Submission Procedures guide is also adhered to.
- Admissions Specialists and Student Services Representatives are responsible for data collection, entry and verification of student data prior to submission to the Division.
- In accordance with the Family Educational Rights and Privacy Act (FERPA), PBSC informs all students of what student information and personal information can be shared without consent. All students can opt out of this notice at any time. Additionally, a release of social security number (SSN) notice is provided to all students upon enrollment.
- Administrators attend Division events such as quarterly webinars and Management Information System Advisory Task Force meetings. Other professional learning events are attended when the opportunity is available.
- Samples of CTE student data were reviewed and verified for accuracy as part of the OSMR. All student records were provided by PBSC. Records reviewed included:
  - CTE industry certifications
  - Postsecondary Adult Vocational program completers
- All records are kept in accordance with Florida Statutes and Department policy.

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

- PBSC offers CTE programs on five campuses within their service region: Lake Worth, Belle Glade, Loxahatchee Groves, Palm Beach Gardens and Boca Raton.
- PBSC has a memorandum of understanding (MOU) with CareerSource Palm Beach County to provide workforce training, employment assistance and other services for those interested in workforce programs and services. The two work closely to ensure an integrated and efficient delivery of those services. The MOU states the expectations of each party to maximize their effectiveness and avoid a duplication of services provided.
- In partnership with PBCSD, PBSC offers high performing students the opportunity to participate in dual enrollment (DE) courses with the college. Students enrolled in DE courses with PBSC can obtain college credits, along with Workforce credentials and certifications applicable to their course of study. DE is offered on all five campuses.
- PBSC offers students multiple opportunities to participate in additional learning activities outside of the classroom.
  - The cosmetology clinic and dental hygiene lab both offer services available to the public for a nominal fee depending on the services provided. Services are performed by students under direct supervision of a licensed instructor.

- Multiple clubs and student organizations are available for students to participate in program-themed learning environments.
- In compliance with Florida Administrative Code and Section 504 of the Rehabilitation Act of 1973, no student who self-declares a disability is denied appropriate and reasonable accommodation as determined by the student's individual needs and available college resources. As part of the Center for Student Accessibility (CSA), each campus has a CSA Advisor to assist students with appropriate accommodations.
- PBSC offers ample professional learning and training to CTE administrators and staff. Instructors also participate in ongoing training provided by the Division, as well as annual professional learning through the college. Program-specific training and/or certification is also completed as required.

**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 Workday®, the college's fixed asset management system.
- PBSC has policies and procedures on property management, equipment safety/storage, inventory reconciliation and inventory disposal. In addition to these policies and procedures, PBSC has internal controls and procedures to govern loss prevention, transfer of property and the surplus of capital equipment.
- The Vice President of Finance and Administration is responsible for property, equipment and inventory management across all campuses, but each campus has a Property Custodian that is responsible for all equipment at his or her site. The Property Custodian is also responsible for safeguarding equipment against theft and maintaining equipment.
- If a piece of equipment must be moved from its original location, the Property Custodian is made aware of the move and reports it to the Property Control Office.
- Capitalized equipment is inventoried at least annually, and all inventoried property must match the records maintained within Workday®. Property Custodians must immediately report any property that is considered lost, stolen or missing. Any property deemed inoperable must be presented to the college Board prior to disposal.
- PBSC reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
- Monitoring staff conducted inventory reviews at multiple PBSC campuses, and all inventory was accounted for and in its correct location. The capitalized inventory monetary threshold is \$5,000.

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

- PBSC included the necessary policies required by the General Education Provisions Act (GEPA) and other federal laws, which ensure equal access and participation in programs regardless of sex, race, national origin, color, disability or age.

**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.

**Documents reviewed were:**

- Notification of SSN collection, usage and release
- Student authorization for access to educational records
- FERPA notification
- Time and effort reports
- Student data
- Fiscal and operational policies and procedures
- Multiple MOUs
- DE articulation agreement
- DE guide (online)
- Program advisory committee meeting records
- Travel records
- GEPA statement
- CSA Manual
- CLNA documentation
- Secondary LMA sources
- Program recruitment materials

**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.

- Workday® is used as PBSC's financial management system. Purchases, contracts, deliverables and all fiscal aspects are housed within the system.
- PBSC has a Tools and Resources manual that governs all fiscal aspects of a federal award. The following components of the manual were reviewed as part of the monitoring process:
  - Purchasing guidelines and procedures
  - Contracts and bids
  - Purchasing cards (P-card)
  - Inventory management
  - Procurement
  - Conflict of interests
  - Ethics
  - Travel
- Project managers routinely review their grant budgets to keep track of current expenditures and to ensure that there is no cost overrun between object codes. If the scope of a project changes or if funds need to be re-allocated, an amendment is drafted and submitted to the Division.
- PBSC does not use grant-funded purchasing cards (P-card), but the college does have policies and procedures governing its use, if applicable.
- Purchase orders (PO) are the primary procurement method used to obtain goods and services by the college. A Requisition to Purchase form is submitted to the Purchasing Office and based off the information within the requisition, a PO is issued once the method of procurement is determined. The Purchasing Office reviews all requests and signs POs prior to being processed.
- The PO lifecycle is as follows:
  - The grant manager and finance department determine if the purchase is allowable with federal award dollars.



- The procurement method is determined, and quotes or bids are obtained from the vendor.
  - A purchase request is created in Workday®.
  - Once approved, the requisition is converted to a PO and sent to the selected vendor.
  - The PBSC receiving department accepts delivery of the item(s).
  - Capitalized equipment (\$5,000 and above) is tagged prior to delivery to the appropriate campus and department.
  - The Purchasing Office receives the vendor invoice and pays the vendor.
  - All supplies, equipment and services charged to a grant-funded source is purchased using sound judgement and obtained at the lowest cost possible. Expenditures must go toward the operation of programs within the scope of the grant.
  - PBSC does have a dedicated contract manager who is responsible for any agreements entered that use federal grant dollars. This individual ensures that contract deliverables fall within the scope of the federal award and is responsible for receipt and review of all applicable deliverables associated with the contract.
  - PBSC provided additional fiscal records such as:
    - Time and effort
    - Procurement
    - Travel
- All records 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.

- PBSC has numerous collaborations, partnerships and MOUs throughout their service region. These partnerships aid in the expansion and implementation of the core objectives of PBSC. The list of partners includes, but is not limited to:
  - CareerSource Palm Beach County
  - Palm Beach County School District
  - Business Development Board of Palm Beach County

## **VIII. RESULTS**

PBSC was not found to be out of compliance.

## **IX. SUMMARY**

After completing the monitoring review and receiving any additional information requested, a preliminary report is sent to the provider for their review. The Division monitoring team lead may consider comments at their discretion. Once the final report is approved, it will be sent to the agency head and a copy will be sent to the provider's designated contact person. The final report will also be posted on the Department's website, which you can find at:

<http://fldoe.org/academics/career-adult-edu/compliance>

Once all outstanding corrective action plan items have been completed (when applicable), the Division will issue a closure letter to the agency head and designated contact person. This letter will signify the end of the monitoring process and that no further action is required.

The monitoring team would like to extend their appreciation to all participants in the Palm Beach State College monitoring review, on behalf of the Division. A special thanks is offered to Mr. Daniel Alvarez for his participation and leadership during this process.

**APPENDIX A**

Palm Beach State college  
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>Palm Beach State College</b>					
Program Type: <b>CTE</b>					
Monitoring Year: <b>2023-2024</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><b>X 10</b></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>5</b>	<u><b>X8</b></u>	<b>40</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
<b>Number of Perkins Grants</b>	4 or More	7	<b>3</b>	<u><b>X 8</b></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>0</b>	<u><b>X 6</b></u>	<b>0</b>
	No	0			
<b>Agency CTE Program Director Change from Previous Fiscal Year</b>	Yes	7	<b>7</b>	<u><b>X 6</b></u>	<b>42</b>
	No	0			
<b>Unexpended Funds from all Perkins Grants Combined</b>	Upper Quartile	7	<b>7</b>	<u><b>X 4</b></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>3</b>	<u><b>X 4</b></u>	<b>12</b>
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>176</b>

Data sources used for calculations: Prior to July 1, 2022



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

**Kara Kearce**  
**Director of Quality Assurance and Compliance**  
**[Kara.Kearce@fldoe.org](mailto:Kara.Kearce@fldoe.org)**  
**850-245-9033**

**Florida Department of Education**  
**Division of Career, Technical and Adult Education**  
**325 West Gaines Street · Room 722A**  
**Tallahassee, Florida 32399**