

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

Okaloosa County School District

November 2-3, 2023

Final Report

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Florida Department of Education Division of Career and Adult Education

Okaloosa County School District Adult Education and 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) unit 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 Used for Career and Technical Education (CTE) under the Carl D. Perkins Strengthening Career and Technical Education for the 21st Century Act, and for Adult Education (AE) under the Workforce Innovation and Opportunity Act 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 CFR 76.770, Education Department General Administrative Regulations and the Uniform Grant Guidance for grant awards issued on or after December 26, 2014. The Division 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 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 Okaloosa County School District (OCSD) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Marcus Chambers, Superintendent, on September 11, 2023. The designated representative for the agency was Ms. April Branscome (CTE) and Mr. Jon Williams (AE). The Division's representative conducting the OSMR was Program Specialist Charles Davis of the QAC section.

V. Okaloosa County School District

ENROLLMENT: FY 2021-22

CTE (possible duplication at program level): Secondary – 8,865

Postsecondary – 654 AE-88

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

Finance

FY 2020-21			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Secondary	460-1611B-1CS01	\$ 332,034.00	\$ 551.58
Perkins Postsecondary	460-1611B-1CP01	\$ 101,633.00	\$ 3,924.26
FY 2021-22			
Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	460-1612B-2CS01	\$ 332,628.00	\$ 19,249.23
Perkins Postsecondary	460-1612B-2CP01	\$ 123,064.00	\$ 77,241.91
Adult Education-AGE	460-1912B-2CG01	\$ 267,780.00	\$ 122,824.53
FY 2022-23			
Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	460-1613B-3CS01	\$ 306,396.00	\$ 16,947.54
Perkins Postsecondary	460-1613B-3CP01	\$ 111,132.00	\$ 7,511.32
Adult Education-AGE	460-1913C-3CG01	\$ 320,280.00	\$ 110,668.10

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

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 site as part of the OSMR:

- Crestview High School
- Fort Walton Beach High School
- Okaloosa Technical College (OTC)

Entrance and Exit Conferences

The entrance conference for OCSD was conducted on November 2, 2023. The exit conference was conducted on November 3, 2023. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
April Branscome	Director, CTE Secondary, OCSD	X	X
Jon Williams	Director, Okaloosa Technical College	X	X
David Welch	Teacher on Special Assignment, OCSD	X	X
Division Monitoring Team			
Michael Swift	Program Specialist, QAC, Division	X	X
Charles Davis	Program Specialist, QAC, Division	X	Х

Interviews

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

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, section F. A minimum of 50 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.
 - As part of the required comprehensive local needs assessment, Secondary CTE administrative staff consulted with numerous individuals and entities across the Okaloosa County service area. Stakeholder groups also provided insight into the workforce needs and opportunities for those students. The list of stakeholders includes, but is not limited to:
 - o CareerSource Okaloosa/Walton
 - Vertex Aerospace
 - o District staff, faculty, students and administrators
 - o Boys & Girls Club
 - o Economic Development Council
 - The district conducts ongoing professional 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 sponsored training events are also attended. OCSD also provided documentation supporting

- district-wide instructional training and professional learning.
- OCSD adopted the records retention schedules published by 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 of 5 years.
- **B.** <u>DATA AND ASSESSMENT</u> 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.
 - OCSD currently utilizes FOCUS® as their management information system and student information system 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 survey reports submitted to the Department. The student survey
 reports are used to ensure the accuracy of data reports submitted to the Department, and the
 reconciliation of error reports they may receive from the state.
 - OCSD conducts extensive and ongoing training for all individuals who have access to student data. Those individuals also participate in Department-sponsored training events such as quarterly webinars for AE and CTE, Workforce Education and District Data Advisory Council meetings, Florida Association of Management Information Systems and workforce development information system conferences. Local, district-wide training also takes place as needed.
 - All proctors of the Tests for Adult Basic Education and the Comprehensive Adult Student Assessment System are trained and certified, as required, by the state and the appropriate testing companies Testing certificates were provided as evidence.
 - OTC students are assigned Family Educational Rights and Privacy Act rights at application and any subsequent change must be in writing and maintained in the students electronic or paper folder.
 - Samples of CTE student data was reviewed and verified for accuracy as part of the OSMR.
 All student records provided by OCSD were compliant with reported student data. Records reviewed included:
 - Secondary CTE industry certifications
 - Postsecondary CTE industry certifications
 - Postsecondary program completers
- C. <u>CURRICULUM AND INSTRUCTION</u> refer to those elements that contribute to student learning and skill acquisition.
 - 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.
 - Special populations are encouraged to enroll in career education programs and receive
 appropriate accommodations and/or modifications to place them in the least restrictive
 environment. The district puts great 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
 Special Education teachers and school administration to ensure equal access and work with

- individual education plan teams to ensure compliance with the Individuals with Disabilities Education Act.
- The OSCD ensures compliance with federal anti-discrimination laws and General Education Provisions Act.
- Students also participate in career and technical student organizations 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 the Department and the corresponding postsecondary program at OTC. Various other district articulation agreements were reviewed and verified for the appropriate secondary to postsecondary linkage.
- In accordance with WIOA, OCSD has an MOU with CareerSource Okaloosa/Walton 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 training provided by the Department and annual professional learning throughout the district. Instructors also participate in program-specific training and certification programs.
- In addition to employees having a non-discrimination policy, OCSD's CTE department follows a non-discrimination policy for students.
- **D.** <u>TECHNOLOGY AND EQUIPMENT</u> 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 capital assets are recorded in the Focus® Fixed Asset System.
 - The district's threshold for capitalization is \$5,000.
 - School Principal and Departmental managers or their designee are the responsible Property Managers (Custodians) of property charged to and under their area of accountability.
 - Computerized fixed asset records are maintained by the Property Control Department for each school campus, administrative area, departmental and special center where qualifying equipment is utilized and housed. Physical inventory is taken annually by the district finance department or contracted vendor. The condition of assets is noted at that time.
 - As part of the OSMR the QAC team conducted inventory search at OTC. Findings were uncovered at the time of the inventory review. See Finding 1.
- **E.** <u>EQUAL ACCESS</u> refers to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation and completion of programs.
 - OCSD included the necessary policies required by the General Education Provisions Act, which ensures equal access and participation in programs regardless of sex, race, national origin, color, disability or age.
- **F.** <u>RECORDS REVIEW</u> 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
- Comprehensive Local Needs Assessment (CLNA) w/supporting documents
- CLNA advisory committee records and stake holder records
- Inventory records
- Procurement records
- ESE manual
- MOUs and articulation agreements
- Advisory committee records agendas, sign-in sheets, etc.
- District professional training records agendas, sign-in sheets, training materials, etc.
- 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.
 - Focus® is used as the district's enterprise resource planning 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
 - o Fiscal internal controls
 - o Records and reporting
 - Inventory management
 - Procurement
 - o Conflict of interests
 - Temporary duty assignment (travel) OCSD uses state-approved guidelines for travel-related expenditures such as mileage rates, per diem and food allowances.
 - The district does use purchasing cards specifically for grant funds. Employees must sign a credit card use agreement form prior to using the district's purchasing card. The agreement certifies the employee's understanding of the proper use of the card and the results for misuse of the card.
 - OCSD 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.
 - Monitoring staff conducted a budget analysis of OCSD's Department grants. See Finding 2.
 - **H.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships or MOU that are in place to benefit an agency's programs and students.
 - OCSD 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:
 - Okaloosa Technical College (Articulation)
 - o CareerSource Okaloosa/Walton

VIII. RESULTS

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

Finding Number	1				
Area	Inventory Management				
Finding Summary	Multiple pieces of equipment at Crestview High School were missing asset identification tags or had incorrect tags.				
Finding Detail	OCSD staff located the correct asset identification tags and provided photographic evidence for their corrective action.				
Citation	Violation of UGG 2 CFR 200.313; UGG 2 CFR 200.313(c); UGG 2 CFR 200.303(d)(3)				
Recommended/ Anticipated Corrective Action	Director of CTE program shall provide a letter of attestation stating the acceptance of the finding and the plan of corrective action.				
Anticipated completion date:	January 18, 2024				
Name(s) and Title(s) responsible for corrective action:	April Branscome, Director, CTE Secondary, OCSD				
Plan accepted by: Chuck Davis Date: 1/18/2024					
Status of Action Plan (to be completed by Division staff)					
Status of CAP: Complete	Date: 1/18/2024				

Finding Number	2
Area	Finance
Finding Summary	A grant budget analysis (GBA) was conducted for OCSD for all grants from 2020-2023. There was an error in: Object codes were overspent with no budget amendments submitted.
Finding Detail	 FY 2020-21 CTE-Secondary: Object code 642 was overspent by \$12,148.04 with no budget amendments submitted. It was discovered that there was a clerical error. Due to the fact the

	grant year was during a COVID year, OCSD was not required to pay a monetary penalty.				
Citation	Violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments. Along with 2 CFR 200.308, (b) (c) Revisions of the budget & program plan, and 2 CFR 200.407, not seeking prior approval before expending funds.				
Recommended/ Anticipated Corrective Action	The CTE director will provide a letter of attestation and plan of corrective action.				
Anticipated completion date:	January 18, 2024				
Name(s) and Title(s) responsible for corrective action:	April Branscome, Director, CTE Secondary, OCSD				
Plan accepted by: Chuck Davis Date: 1/18/2024					
Status of Action Plan (to be completed by Division staff)					
Status of CAP: Complete Date: 1/18/2024					

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 Department 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 Okaloosa County School District monitoring review on behalf of the Department. Special thanks are offered to Ms. April Branscome and Mr.Jon Williams for their participation and leadership during this process.

APPENDIX A

Okaloosa County School District Career and Technical Education Risk Matrix

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

Agency Name: Okaloosa County School District

Program Type: CTE

Monitoring Year: 2023-2024

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7			
Number of Years Since Last	5-6	5		<u>X 10</u>	30
Monitored	3-4	3			30
	0-2	1			<u> </u>
	Upper Quartile	7			
Total Budget for all Perkins	Upper Middle	5	Ī _	770	40
Grants Combined	Lower Middle	3	5	<u>X8</u>	40
	Lower Quartile	1			
	4 or More	7		<u>X 8</u>	
Number of Perkins Grants	3	5	_		40
Number of Perkins Grants	2	3	5		
	1	1			
Change in Management	Yes	7	7	V.C	42
Information Systems (MIS) from Previous Fiscal Year	No	0	,	<u>X 6</u>	42
Agency CTE Program Director Change from Previous Fiscal	Yes	7	7 <u>></u>	V 6	42
Year	No	0		<u>X 6</u>	42
	Upper Quartile	7			
Unarmanded Funds from all	Upper Middle	5			
Unexpended Funds from all Perkins Grants Combined	Lower Middle	3	7	<u>X 4</u>	28
Terkins Grants Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7	1 <u>X4</u>		
Number of Findings from the	Upper Middle	5			
Office of the Auditor General	Lower Middle	3		4	
Office of the Auditor General	Lower Quartile	1			
	0	0			
			AGENCY RISK	SCORE:	226

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

Okaloosa County School District Adult Education Risk Matrix

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

Agency Name: Okaloosa County School District

Program Type: **AE**

Monitoring Year: 2023-2024

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7	7		
Number of Years Since Last	5-6	5		<u>X10</u>	70
Monitored	3-4	3		<u> </u>	70
	0-2	1			
	Upper Quartile	7			
Total Budget for all Adult	Upper Middle	5	3	<u>X 8</u>	24
Education Grants Combined	Lower Middle	3			24
	Lower Quartile	1			
	4 or More	7			
Number of Adult Education	3	5	4	<u>X 8</u>	0
Grants	2	3	1		8
	1	1			
Change in Management	Yes	7	0	V.	0
Information Systems (MIS) from Previous Fiscal Year	No	0	0	<u>X 6</u>	0
Agency AE Program Director Change from Previous Fiscal	Yes	7	0	<u>X 6</u>	0
Year	No	0			I
	Upper Quartile	7	7	<u>X 4</u>	
Unexpended Funds from all	Upper Middle	5			
Adult Education Grants	Lower Middle	3			28
Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7	1	<u>X 4</u>	
Number of Findings from the	Upper Middle	5			
Office of the Auditor General	Lower Middle	3			4
Office of the Auditor General	Lower Quartile	1			
	0	0			
	Target Not Met		3 <u>X 6</u>		
	on 3 of 3	5			
	Indicators				
	Target Not Met				18
Adult Education Program	on 2 of 3	3		X 6	
Improvement Plan (AEPIP)	Indicators			71.0	10
	Target Not Met				
	on 1 of 3				
	Indicators				
	All targets met	0			
			Agency R	isk Score	152

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

Please address inquiries regarding this report to:

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