



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Gilchrist County School District

December 10 - 12, 2025

Final Report

TABLE OF CONTENTS

I.	Introduction	1
II.	Authority	1
III.	QAC Core Monitoring Guide.....	1
IV.	Provider Selection	1
V.	Gilchrist County School District.....	2
VI.	Monitoring Activities	2
VII.	Observation	3
VIII.	Results	9
IX.	Summary	9
	Appendix A.....	10

Florida Department of Education
Division of Career and Adult Education
Gilchrist County School District
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 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 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. The guide can be found on the Division's website at <https://www.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 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 Gilchrist County School District (GCSD) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Ms. Gina Geiger, Superintendent, on August 15, 2025. The designated representative for the agency was Ms. Lindsey Pearl, Coordinator, CTE and K-12 Readiness.

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

V. GILCHRIST COUNTY SCHOOL DISTRICT

Finance

FY 2022-23

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	230-1613B-3CS01	\$ 36,128.00	\$ 0.00
Perkins Rural	230-1613R-3CR01	\$ 38,964.00	\$ 0.00
Perkins Equipment Upgrade	230-1613R-3CO01	\$ 60,715.00	\$ 0.00

FY 2023-24

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	230-1614S-4CS01	\$ 34,636.00	\$ 0.00
Perkins Rural	230-1614R-4CR01	\$ 39,028.00	\$ 2,358.55

FY 2024-25

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	230-1615S-5CS01	\$ 43,505.00	\$ 4,880.66
Perkins Rural	230-1615R-5CR01	\$ 39,003.00	\$ 8.00

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

<https://www.gilchristschools.org/>.

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

Onsite visits were made at the following locations

- GCSD District Office
- Trenton High School
- Bell Middle School (BMS)
- Bell High School (BHS)

Entrance and Exit Conferences

The GCSD entrance conference was conducted on December 10, 2025. The exit conference was conducted on December 19, 2025. The participants are listed below:

Name	Title	Pre-visit Conference	Exit Conference
Lindsey Pearl	Coordinator, CTE and K-12 Education Readiness, GCSD	X	X
Dorota Micale	Director, Grants Acquisition and Special Projects, GCSD	X	X
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	X	X
Charles Davis	Program Specialist, QAC	X	X

Interviews

Members of the monitoring team and GCSD held a meeting to review and discuss a finding as a result of their grant budget analysis (GBA). See RESULTS section for more information.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, part F. A minimum of 25 student records were checked. In addition, policies and procedures were examined and reviewed 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 Coordinator for Career and Technical Education and K-12 Readiness (Coordinator) is responsible for the overall management of the district’s federal Perkins grants and programs. In addition to managing the grants, this individual serves as the liaison between the district, local postsecondary institutions and the Division to ensure all strategic goals and plans are aligned with local workforce needs and in adherence to the provisions in their approved federal award.
- The Division grant manager for GCSD reported that grant applications and amendments are routinely submitted on time and typically require little to no additional guidance. If revisions are needed, the CTE Coordinator submits those in a prompt manner.
- The Gateway Regional CTE Council (Gateway) is a team consisting of regional stakeholders tasked with executing and enhancing the relationship between GCSD and local postsecondary institutes and the regional workforce. The Gateway team is also responsible for completing the required comprehensive local needs assessment (CLNA) to be included in the district’s Perkins applications. Gateway consists of representatives from Florida Gateway College (FGC), five regional school districts, the local workforce board and health and public service representatives.

The list of stakeholders includes, but is not limited to:

- CareerSource North Central Florida (NCF) – Representatives of local workforce boards
- GCSD CTE instructors, guidance counselors, principals and other district administrators
- Local secondary educational agency representatives

- FGC – Postsecondary representatives
- GCSD Exceptional Student Education Staffing Specialist – Special populations representatives
- Northeast Florida Education Consortium – Out-of-school youth, homeless children and youth at-risk representatives
- Local business owners (private and public)
- Parents and students
- The Gateway team meets with various program advisory councils throughout the year to discuss local workforce needs, economic growth opportunities, job openings and to evaluate program needs throughout the school year.
- As part of the review, monitoring staff verified that Perkins Rural Innovation funds were utilized for the stated purpose in their federal grant application. Based on documentation reviewed, Perkins Rural funds were utilized for the designated rural communities identified in the district's allocation. This was verified via inventory review at the program site approved in the district's rural grant application.
- Throughout the year, GCSD conducts ongoing professional learning and training events to ensure all CTE administrative staff are up to date on any changes that come from the federal and/or state-level Departments of Education. Department-sponsored training events are also attended.
 - GCSD provided multiple records of district-wide training and learning events. District representatives also attend Division training events such as the Florida Association of Career and Technical Education conference and participate in Division webinars.

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.

- GCSD utilizes Skyward® as its integrated Management Information System (MIS) and student information system. The MIS meets all Department requirements as defined by the Data Dictionary.
- GCSD has internal processes and procedures for the collection, verification, analysis and reporting of student data. Division policies on the submission of student data are also adhered to and followed.
- Data collection and validation is an ongoing process, and the district has policies and procedures to ensure the accurate submission of student data every survey period. The verification process follows a strict timeline that begins one month prior to submission, with specific checks and balances leading up to the final submission to the Department. Internal controls are in place for the reconciliation of edits and/or errors.
- At the site level, GCSD maintains dedicated personnel responsible for student registration, data collection and student data verification through a multi-tier checks and balances system. Ultimately it is the responsibility of the Coordinator to ensure all data submitted through the MIS and subsequently to the Department is accurate.
- Controls are in place to ensure accuracy in the reporting of Career and Professional Education funding to the Department. This ensures accurate data is reported through the Florida Education Finance Program for earned industry certifications.
- GCSD provided testing and assessment policies and procedures for all administrators who are involved in direct instruction leading to industry certification exams. Signed agreements were provided to the monitoring team that prevents active CTE teachers from administering certification exams in which they provided direct instruction to the testing subject.

- GCSD provides students with the following notification(s) regarding the use and dissemination of student data:
 - Student data privacy notification
- Samples of CTE student data were reviewed and verified for accuracy as part of the OSMR. All student records were provided by GCSD. Records reviewed included:
 - Secondary Industry Certifications

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

- GCSD offers four CTE academies at each high school within the district. Additionally, GCSD offers exploratory CTE courses in agriculture, carpentry, digital design and business. The intent of the exploratory courses is to introduce middle school students to career pathways they can eventually follow into high school. These exploratory courses are offered at BMS, which shares its campus with BHS to offer a seamless transition for students.
- In their most recent CLNA and according to recent labor market alignment (LMA) lists, GCSD discovered the need to either develop multiple new programs or phase out programs that no longer meet local workforce needs. Those programs included:
 - Cybersecurity (new program)
 - Criminal Justice (phase out)
 - Digital Design (phase out)
- In addition to information gathered from the CLNA and LMA lists, GCSD conducts an annual survey to gauge the interest of students across a variety of program areas. A sample survey was provided as part of the monitoring review.
- GCSD has a memorandum of understanding (MOU) with CareerSource NCF to provide workforce training, employment assistance and other services for those interested in workforce programs. The two work closely to enhance alignment and market responsiveness of workforce, education and economic development systems through targeted integration to provide the local workforce with talented job candidates.
- GCSD has multiple articulation agreements in place that allow high school CTE students to dual enroll at postsecondary institutions while still in high school. This allows students to earn postsecondary credits and certifications in addition to their high school diploma. Agreements are currently in place with:
 - FGC
 - College of Central Florida
 - University of Florida
- GCSD offers students multiple opportunities to participate in additional learning activities outside of the traditional classroom environment. A sample of those opportunities include:
 - Career and Technical Student Organizations allow students to put their classroom skills to use in a variety of ways. Students participate in local, state and national competitions, and are encouraged to run for various leadership positions within each organization.
 - Articulation Agreements are in place with local health care providers to offer clinical settings for health sciences students.
 - Numerous local companies in the region provide opportunities for students to participate in work based learning and on-the-job training in their related field of study.
- In compliance with Section 504 of the Rehabilitation Act of 1973, GCSD works in partnership with CareerSource NCF to ensure students with disabilities have reasonable access to all CTE programs and all workforce services offered by the district and the local workforce board. The CTE Coordinator works closely with the district Director of Special

Areas to ensure students with Individualized Education Plans or 504 Plans receive appropriate accommodations, as needed.

- GCSD 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 district. Program-specific training and/or certifications are also completed as required.
 - GCSD submitted examples of instructor certifications.

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 federal, state and local guidelines are included within the district's fixed asset management system. The district Property Inventory Manual governs the acquisition, usage, safety/storage, inventory reconciliation and inventory disposal of all district equipment. In addition to these policies and procedures, GCSD has internal controls and procedures to govern loss prevention, transfer of property and the disposition of capital equipment.
- Every program site has a designated administrator who serves as the custodian responsible for all equipment at his or her site. This individual works in conjunction with the district Director of Purchasing, who is responsible for all property and equipment district wide.
- A complete inventory of tangible property is conducted annually, with the results compiled by each site custodian, then submitted to the Director of Purchasing and subsequently approved by the School Board.
- Policies and procedures are in place for equipment that is either lost or believed to be stolen. Lost items must be reported immediately upon discovery, and if evidence shows that an item is believed to be stolen, the property custodian must request a formal police incident report. GCSD reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
- Monitoring staff conducted inventory reviews at multiple GCSD campuses and all inventory was accounted for and in its correct location. QAC staff verified inventory at the federal \$5,000 threshold, as well as spot checked \$1,000 items for internal controls compliance. No issues were uncovered.

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

- GCSD 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 are:

- Student data privacy notification
- Student handbook
- High school registration guide
- CTE operations manual

- Time and effort reports
- Student data
- Employer cooperative learning guidelines
- District policies and procedures
- Multiple MOUs
- Dual enrollment articulation agreement
- Advisory committee meeting records
- GEPA statement
- CLNA documentation
- Professional learning samples

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 GCSD's financial management system. All aspects of procurement and contractual agreements are housed within the system.
- GCSD has policies and procedures that provide uniform and systematic internal controls to promote efficient fiscal responsibility and accountability in the expenditure of federal funds. The following components of the procedures manual were reviewed as part of the monitoring process:
 - Cash Management
 - Contract Management
 - Fiscal Planning
 - Internal Controls
 - Procurement
 - Travel
 - Conflict of Interest
- GCSD does use grant-funded P-cards for expending grant funds. All purchases made with P-cards must receive prior approval and be used solely for the operation of a grant-funded program or when encumbering expenses necessary for tasks such as travel and conferences. When a P-card is used, it is the responsibility of the authorized card holder to submit proper documentation to the P-Card Reconciler within a week of the transaction's post date in Skyward®. Sample P-card transactions and reconciliations were provided by MCSD.
- GCSD has specific guidelines to ensure that grant funds will be used to supplement programs and funding and not supplant or replace existing program funding. Multiple general ledgers were submitted as evidence that federal grant dollars are being used alongside other funding sources for the operation of the program.
- All purchases must be in accordance with, and as permitted by, applicable federal and state laws, Department rules and GCSD policies and procedures. GCSD provided Internal Control procedures that promote transparency and accountability in the expenditure of grant funds.
- All purchase requisitions are conducted and managed via Skyward®. Once a purchase is authorized all documentation, including quotes, contracts and supporting documentation, is reviewed within the system by the Finance Manager. Upon authorization by the project manager who requests the purchase, the Finance Department will issue a purchase order (PO) to provide for the vendor. If any modifications are required once a PO is approved and submitted to the vendor, those changes must be authorized by the district Chief Financial Officer (CFO) via a Change Order Request.

- Additional internal controls are in place for the expenditure of federal grant funds to ensure further compliance with the terms and conditions of each specific award.
- Policies are also in place for the acquisition of single/sole source items or services, in addition to emergency purchases.
- Except as authorized by law or rule, competitive solicitations shall adhere to the following thresholds:
 - Less than \$4,999.99 – No quotation is required and is considered a Micro-Purchase by state and federal guidelines.
 - \$5,000 - \$9,999.99 – Three or more documented verbal or written quotes are required and approved by the district CFO. This includes aggregate purchases such as laptops/tablets whose individual value does not meet the purchasing threshold, but the entire lot/order does.
 - \$10,000.00 - \$35,000.00 – Three or more written quotes are required and approved by the Chief Financial Officer.
 - All purchases greater than \$35,000.01 requires sealed bids and/or solicitation as required by federal, state and district policy.
- Specific guidelines are also in place for professional services contracts when the value of a contractual agreement exceeds \$35, 000.01. All contractual services are reviewed and approved by the school administrator, department coordinator or authorized School Board representative with primary responsibility for the services provided under the agreement. The district Finance Office will then approve payment to the vendor.
- QAC monitoring staff conducted a fiscal review of the providers’ approved grant budget narrative and final expenditure reports. Upon review, multiple errors were uncovered that led to a finding. Additionally, multiple final expenditure reports were submitted to the Department Comptroller’s Office after the agreed date in the grant award notification(s). See the “RESULTS” section for more detail.
- GCSD provided additional fiscal records such as:
 - Time and effort
 - General ledger entries
 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.

- GCSD has numerous collaborations, partnerships and MOUs throughout their service region. These partnerships aid in the expansion and implementation of the core objectives of GCSD. The list of partners includes, but is not limited to:
 - CareerSource North Central Florida
 - Florida Gateway College
 - College of Central Florida
 - University of Florida
 - Florida Department of Transportation
 - Ayers Health and Rehabilitation
 - Duke Energy
 - Tri-County Metals

VIII. RESULTS

GCSD was found to be out of compliance in the following area:

Finding Number	1
Area	Finance
Finding Summary	Upon review of the grant budget analysis, it was discovered that multiple object codes across multiple program years were used but were not pre-approved via the original budget narrative or amendment. Additionally, object codes were over-spent.
Finding Detail	Grant: 210-1614S-4CS01 and 210-1613R-3C001
Citation	Violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments." Along with <u>2 CFR 200.308, (b) (c)</u> , revisions of the budget and program plan, and <u>2 CFR 200.407</u> , not seeking prior approval before expending funds.
Recommended/Anticipated Corrective Action	The CTE Coordinator provided ledger validation of the expenditures. Upon review, all expenses would have been approved had an amendment been submitted. This will result in no monetary payback and no further action is required.
Anticipated completion date:	Complete
Name and Title responsible for corrective action plan	Lindsey Pearl, Coordinator, CTE and K-12 Education Readiness, GCSD

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 can be found 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 Gilchrist County School District monitoring review, on behalf of the Division. A special thanks is offered to Ms. Lindsey Pearl and Dorota Micale for their participation and leadership during this process.

APPENDIX A

Gilchrist 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: Gilchrist County School District					
Program Type: CTE					
Monitoring Year: 2025-2026					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	5	<u>X 10</u>	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	3	<u>X8</u>	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	5	<u>X 8</u>	40
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	<u>X 6</u>	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					196

Data sources used for calculations: Prior to July 1, 2024



Please address inquiries regarding this report to:

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