



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Pinellas County Schools

May 9-11, 2023

Final Report

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Florida Department of Education
Division of Career and Adult Education
Pinellas County Schools
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, oversees 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 21st 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 Pinellas County Schools (PCS) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Kevin Hendrick, superintendent, on November 21, 2022. The designated representative for the agency was Mr. William (Mark) Hunt. The division's representative conducting the OSMR was program specialist Kristin Joyner of the Quality Assurance and Compliance section.

V. Pinellas County Schools

ENROLLMENT:

CTE (possible duplication at program level): Secondary – 46,597; Postsecondary – 3,548
 AE – 3,155

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	520-1610B-0CS01	\$ 1,154,978.00	\$ 83,650.42
Perkins Postsecondary	520-1610B-0CP01	\$ 470,923.00	\$ 140,544.35
Adult Education - Corrections	520-1910B-0CC01	\$ 100,00.00	\$ 39,114.80
Adult Education - AGE	520-1910B-0CG01	\$ 1,054,306.00	\$ 97,522.55
Adult Education - Civics	520-1930B-0CE01	\$ 137,570.00	\$ 14,304.92

FY 2020-21

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	520-1611B-1CS01	\$ 1,054,534.00	\$ 172,909.15
Perkins Postsecondary	520-1611B-1CP01	\$ 613,092.00	\$ 92,316.25
Adult Education - Corrections	520-1911B-1CC01	\$ 100,000.00	\$ 3,966.97
Adult Education - AGE	520-1911B-1CG01	\$ 1,054,306.00	\$ 45,135.66
Adult Education - Civics	520-1931B-1CE01	\$ 137,570.00	\$ 20,796.68

FY 2021-2022

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	520-1612B-2CS01	\$ 1,077,802.00	\$ 121,064.65
Perkins Postsecondary	520-1612B-2CP01	\$ 537,326.00	\$ 71,418.96
Adult Education - Corrections	520-1912B-2CC01	\$ 100,000.00	\$ 30,278.97
Adult Education - AGE	520-1912B-2CG01	\$ 1,152,366.00	\$ 93,785.75
Adult Education - Civics	520-1932B-2CE01	\$ 167,061.00	\$ 47,137.37

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

<https://www.pcsb.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. Inventory reviews are also conducted when onsite with a provider.

Onsite Visits

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

- Pinellas Technical College (PTC-C), Clearwater
- Clearwater Adult Education Center
- Clearwater Intermediate/Pinellas High Innovation
- Countryside High School
- Northeast High School
- Gibbs High School
- Pinellas Technical College (PTC-SP), St. Petersburg
- Hollins High School
- Seminole High School
- Oldsmar Adult Education Center

Entrance and Exit Conferences

The entrance conference for PCS was conducted on May 9, 2023. The exit conference was conducted on May 11, 2023. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Mark Hunt	Executive Director	X	X
Steve Plummer	Program Specialist, CTE	X	X
Suzanne West	Program Specialist, CTE	X	X
Jill Lord-Shelby	Instructional Staff Developer, CTE	X	
Diamante Sadlowski	Resource Teacher, CTE	X	
Michael McCullough	Program Specialist, CTE	X	
Jennifer Harrington	Curriculum Coordinator, AE	X	X
Raylee Fleisch	Curriculum Coordinator, AE	X	X
Margaret Paynter	Managing Officer, AE	X	X
Ron Schnell	Coordinator, CTE	X	X
FDOE Monitoring Team			
Kristin Joyner	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	X

Interviews

No interviews were required as part of the OSMR. PCS 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. DCAE reviewed 40 student records. 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 Executive Director is responsible for the management of the district's CTE and AE grants. He works with the Superintendent and shares leadership in the planning, organizing, coordinating and evaluating of the programs. His team of specialists and managing officer ensure all aspects of their grants are properly executed in accordance with their approved project applications.
- As part of the required comprehensive local needs assessment (CLNA), Secondary and Postsecondary CTE administrative staff consulted with numerous individuals and entities across the Pinellas County service area. Representatives from stakeholder groups also provide insight into the workforce needs and opportunities for special student populations. The list of stakeholders includes, but is not limited to:
 - Local Chamber of Commerce – Representatives of local workforce board
 - District staff, faculty and administrators – Local educational agency representatives
 - Pinellas Technical College (PTC) – Postsecondary representatives
 - Boys and Girls Club of Suncoast – Representatives for homeless and at-risk youth
 - CareerSource Pinellas – Representatives of special populations
 - Parents and students
 - Local business owners (private and public)
- Each CTE cluster has an advisory committee that assists with the development of their specific program area(s) and provides ongoing consultation as it relates to the CLNA. These advisory committees meet throughout the year and serve as the primary link between PCS and the surrounding community, industries and businesses. Samples of meeting minutes and agendas were submitted as part of the monitoring process.
- PCS 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.

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.

- PCS utilizes FOCUS® in conjunction with Performance Matters® 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.
- The Career, Technical and Adult Education (CTAE) Operations Specialist and the Data Management Technician are responsible for data collection, entry and verification. The CTAE Operations Specialist also attends trainings, meetings and webinars and shares this information with other CTAE staff in the annual Business Rules Meetings. Policies, procedures and job descriptions were provided by the district as part of the monitoring process. Policies and procedures were also provided in regards to full-time equivalent (FTE) survey reports submitted to FDOE. Student survey reports are used to ensure the accuracy of

data reports submitted to FDOE, and the reconciliation of error reports they receive from the state.

- Attendance and withdrawal policies for adult learners were provided by PCS. The district provided additional documentation showing a student automatically withdrawn after six consecutive absences, but in accordance to the aforementioned policies and procedures, the student was allowed to re-enroll in the same course because it was within the 30-day grace period.
- All proctors of the Tests for Adult Basic Education (TABE) and Comprehensive Adult Student Assessment System (CASAS) are trained and certified, as required, by the state and the appropriate testing company. Policies and procedures on TABE testing and proctor certifications were verified at the time of monitoring.
- PCS submitted a “Collection of Data Elements” attestation stating that all elements required of their local MIS are in place.
- Student registration packets seek to identify students with disabilities and student directory information opt-out forms are included as required by the Family Educational Rights and Privacy Act (FERPA).
- Samples of CTE and AE student data were reviewed and verified for accuracy as part of the OSMR. Records reviewed included:
 - AGE completers (literacy completion points) – one instance of noncompliance. See Finding 1.
 - Postsecondary adult vocational (PSAV) completers
 - Secondary CTE industry certifications
 - Postsecondary CTE industry certifications

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

- PCS offers many CTE and AE programs throughout their service area.
- PCS CTE Labor Market Alignment of all CTE programs was conducted using the Statewide and Regional Occupations Lists provided by the FDOE CTE department. The primary Standard Occupational Classification (SOC) Codes provided in the curriculum frameworks for each program were compared to the Demand Occupation List (DOL). Letters of support were provided for Cabinetmaking, Public Works, Television Production Technology, Child Care Center Operations and Electronic Systems Integration and Automation.
- PCS has memorandums of understanding (MOU) with CareerSource Pinellas and Pinellas County Sheriff’s Office to provide workforce training, employment assistance and other services for those interested in workforce programs and/or literacy services.
 - Through a collaboration with Pearson VUE, General Educational Development (GED) testing sites were opened within the confines of Pinellas County Jail (PCJ) to provide corrections adult learners the opportunity to complete their GED while incarcerated.
 - The YouthConnect program (offered at both PTC campuses) provides qualified students with bus passes, gas cards and test vouchers upon release.
- The district also partners with local healthcare providers to provide nursing and other health care students with patient care settings to observe and complete clinical hours as part of their program.

- All adult students are to be pre-tested utilizing TABE or CASAS prior to receiving any instructional contact hours. The result of the pre-test will determine a student's initial educational functioning level, while post-tests are used to identify educational gains.
- Heating, Ventilation, Air Conditioning & Refrigeration (HVACR) is offered to adult English Speakers of Other Languages (ESOL) students at PTC as part of their Integrated Education and Training (IET) program to prepare AE learners for in-demand job opportunities, in addition to their Integrated English Literacy and Civics Education (IELCE) curriculum. Upon completion of the program, students have the opportunity to acquire their Occupational Safety and Health Administration (OSHA) Construction Industry Certification.
 - Computer Systems & Information Technology is offered as an IET program through Clearview Adult Education Center at PCJ for AE correctional students. Several credentials are offered upon completion of this program to assist an ex-offender in preparation of re-entry.
- PCS offers high school students the option to dual enroll (DE) at multiple colleges in a multitude of program areas and programs of study. High school students that participate in select college credit and vocational programs earn credits towards their college degree, Postsecondary industry certifications and diploma.
- Students also participate in Career and Technical Student Organizations (CTSO) which allow them 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.
- 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.
- PCS's Exceptional Student Education Department works directly with students with disabilities. No reasonable exemptions, services and accommodations are denied to those students.
- Information provided regarding a student's disability is considered confidential and cannot be released to individuals or agencies outside the school/college without the parent/student's signed consent. This information along with other student data and records are protected under FERPA.
- Policies, procedures and internal controls are in place to ensure compliance with the General Education Provision Act (GEPA) to ensure equal access and participation in AE and CTE programs regardless of sex, race, national origin, color, disability or age.

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 their fixed asset system.
- PCS has policies and procedures on property management, equipment safety/storage, inventory reconciliation and inventory disposal.
- PCS has dedicated personnel responsible for managing property and inventory. The essential job functions of the Property Control Clerk include, but are not limited to:
 - Ensures an annual physical inventory of School Board owned property is conducted.
 - Handles the acquisition, transfer and disposition of School Board property.
 - Prepares and continually maintains inventory spreadsheets.
 A job description was provided as part of the monitoring process.
- As part of the OSMR, the QAC team conducted inventory searches at 10 locations. All items were found in their appropriate locations and available for student access and use.

E. **EQUAL ACCESS** refers 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:

- MIS data quality checklist attestation
- Policies and procedures for data collection, verification and reporting
- Policies and procedures for finance and procurement
- Policies and procedures for property management
- CLNA w/supporting documents
- CLNA advisory committee records and stake holder records
- Program of Study documents
- Student outreach engagement – flyers, webinars, seminars, etc.
- GEPA statement
- Job descriptions
- Inventory records
- Procurement records
- Memorandums of Understanding and articulation agreements
- Professional development and training records – agendas, sign-in sheets, training materials, etc.
- CTE and AE student data

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.

- TERMS® is used as PCS's enterprise resource planning (ERP) and financial management system. It allows grant managers and program directors access to real time financial reports for their particular grants.
- The following components of the District's financial policies and procedures manual were reviewed:
 - Budget implementations
 - Records management
 - Cash management
 - Fiscal planning and budgeting
 - Inventory management
 - Procurement
 - Conflict of interest
 - Travel

- In accordance with State statute 112.061(14), PCS’s travel rates for per diem, meals and mileage are established July 1st of each fiscal year based on the prevailing IRS rate.
- The Purchasing Department consists of the following positions:
 - Director
 - Manager
 - Purchasing Analyst
 - Buyer (6)
 - Purchasing Technician
- The district does use purchasing cards, but they’re not allowed for grant funded use.
- The monitoring team conducted a Grant Budget Analysis (GBA) of all PCS’s 2019-2022 CTE and AE original and amendment project award applications. The GBA compares the actual budget to the expenditures reported on the FA399/FA499s submitted to FDOE. See Finding 2.

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.

- PCS has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students across the district’s service area. The list of partners includes, but is not limited to:
 - CareerSource Pinellas (MOA)
 - Pinellas Technical College (articulation)
 - Baycare Health Systems, Inc. (affiliation)
 - Manor Care Health Services (clinical agreement)
 - Pinellas County Sheriff’s Office (MOU)

VIII. RESULTS

PCS was found to be out of compliance due to the following:

Finding Number	1
Area	AE Student Data Reporting
Finding Summary	Student Data was reported incorrectly to the state.
Finding Detail	The monitoring team uncovered a single instance of a student being reported as having earned a literacy completion point (LCP) of “E”, but testing transcripts show that the student actually earned a higher LCP than what was reported.
Citation	Violation of UGG 2 CFR 200.329 "Monitoring and reporting program performance."
Recommended/ Anticipated Corrective Action	The provider will provide a letter of attestation stating the District understands and accepts the finding.
Anticipated completion date:	August 9, 2023

Name(s) and title(s) responsible for corrective action:	Mark Hunt, Executive Director, CTAE Margaret Paynter, Managing Officer, Adult Education
Plan accepted by: Kristin Joyner, Program Specialist	Date: May 30, 2023
Status of Action Plan (to be completed by FDOE staff)	
Status of CAP: Completed	Date: May 30, 2023

Finding Number	2
Area	Finance
Finding Summary	A grant budget analysis (GBA) was conducted for PCS on all 2019-2022 CTE and AE grants. It showed that funds were being spent without prior approval.
Finding Detail	FY 2021-22 <ul style="list-style-type: none"> • CTE – Secondary & Postsecondary • AE – Corrections, AGE & IELCE <p>Object codes were overspent with no amendments submitted.</p>
Citation	Violation of 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 provider will provide a letter of attestation stating the District understands and accepts the finding.
Anticipated completion date:	May 25, 2023
Name(s) and title(s) responsible for corrective action:	Mark Hunt, Executive Director, CTAE Carmela Haley, Director, Special Projects Sheri Bohm, Senior Financial Reporting Analyst
Plan accepted by: Kristin Joyner, Program Specialist	Date: May 30, 2023
Status of Action Plan (to be completed by FDOE staff)	
Status of CAP: Completed	Date: May 30, 2023

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 Pinellas County Schools monitoring review on behalf of the department. Special thanks is offered to Mr. Mark Hunt for his participation and leadership during this process.

APPENDIX A
Pinellas County Schools
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: Pinellas County Schools					
Program Type: CTE					
Monitoring Year: 2022-2023					
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	7	<u>X8</u>	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	3	<u>X 8</u>	24
	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	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					170

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

Pinellas County Schools
Adult Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants					
Agency Name: Pinellas County Schools					
Program Type: AE					
Monitoring Year: 2022-2023					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	5	<u>X10</u>	50
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	7	<u>X 8</u>	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education 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 AE Program Director Change from Previous Fiscal Year	Yes	7	0	<u>X 6</u>	0
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	<u>X 4</u>	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Adult Education Program Improvement Plan (AEPiP)	Target Not Met on 3 of 3 Indicators	5	1	<u>X 6</u>	6
	Target Not Met on 2 of 3 Indicators	3			
	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
Agency Risk Score					192

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



Please address inquiries regarding this report to:

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