



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Suwannee County School District

March 21-22, 2022

Final Report

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Florida Department of Education
Division of Career and Adult Education
Suwannee County School District
Career and Technical Education and Adult Education
Quality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Florida Department of Education (FDOE), Division of Career and Adult Education (division), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The Quality Assurance and Compliance (QAC) section is responsible for designing, developing, implementing, and evaluating a comprehensive quality assurance system, including monitoring. The role of the quality assurance system is to assure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is incumbent upon the division to monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

The FDOE receives federal funding from the U.S. Department of Education (USDOE) 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.

Suwannee County School District (SCSD) monitoring strategy was determined to be an on-site monitoring review (OSMR). Notification was initially sent to Ted L. Roush, superintendent, on November 1, 2021. The designated representative for the agency was Mary Keen. The division's representative conducting the OSMR was the program specialist, Charles Davis of the Quality Assurance and Compliance section.

V. Suwannee County School District

ENROLLMENT:

CTE (possible duplication at program level): Secondary – 3,966; Postsecondary – 341

AE – 127

Finance

The provider was awarded the following grants for fiscal year's (FY) 2018-19, 2019-2020 and 2020-21:

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	610-1619B-9CS01	\$ 93,078.00	\$ 3,432.38
Perkins Postsecondary	610-1619B-9CP01	\$ 56,507.00	\$ 1,093.56
Perkins Rural	610-1619B-9CR01	\$ 48,884.00	\$ N/A
Adult Education - AGE	610-1919B-9CG01	\$ 126,405.00	\$ 10,050.49
Adult Education - IELCE	610-1939B-9CE01	\$ 26,763.00	\$ 4,111.83

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	610-1610B-0CS01	\$ 100,130.00	\$ 7,436.89
Perkins Postsecondary	610-1610B-0CP01	\$ 66,775.00	\$ 23,634.91
Perkins Rural	610-1610B-0CR01	\$ 47,636.00	\$ 6,400.28
Adult Education - AGE	610-1910B-0CG01	\$ 126,405.00	\$ 4,197.41
Adult Education - IELCE	610-1930B-0CE01	\$ 26,763.00	\$ 2,571.85

FY 2020-21

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	610-1611B-1CS01	\$ 100,809.00	\$ N/A
Perkins Postsecondary	610-1611B-1CP01	\$ 71,184.00	\$ 899.54
Perkins Rural	610-1611B-1CR01	\$ 48,276.00	\$ 1,505.33
CARES Act - Rapid Credentialing	610-1230A-1CR02	\$ 183,103.00	\$ 4,272.86
CARES Act - CTE Infrastructure	610-1230A-1C003	\$ 85,546.00	\$ N/A
Adult Education - AGE	610-1911B-1CG01	\$ 126,405.00	\$ 14.20
Adult Education - IELCE	610-1931B-1CE01	\$ 26,763.00	\$ 1,580.82

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

<http://www.suwannee.k12.fl.us/>

VI. MONITORING ACTIVITIES

The monitoring activities included pre and post-review planning, an entrance and exit meeting, records review, and interviews with administrators, if necessary.

Onsite Visits

The monitoring team visited the following locations:

- Branford High School
- RIVEROAK Technical College (RTC)
- Suwannee High School

Entrance and Exit Conferences

The entrance conference for SCSD was conducted on March 21, 2022. The exit conference was conducted on March 22, 2022. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Mary Keen	Director Adult Education & Career and Technical Education	x	x
Marsha Brown	Chief Financial Officer		x
FDOE Monitoring Team			
Chuck Davis	Program Specialist, QAC, FDOE	x	x
Orion Price	Program Specialist, QAC, FDOE	x	x

Interviews

SCSD administrators were available for interviews, if necessary.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, section F. A minimum of 51 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 Director of Secondary and Postsecondary Education is required to plan, develop, implement and evaluate the high school, alternative, career and technical, and adult school instructional programs and provide curriculum and instructional services to high schools.
- Mary Keen provides budget requests and reviews budget performance.
- The CTE and AE programs operate as a cohesive unit. The Director has regular advisory board regular meetings to ensure that both program areas are operating in the best interest of students.
- As part of the required Comprehensive Local Needs Assessment (CLNA), CTE administrative staff consulted with numerous individuals and entities across the district's service area. Those stakeholders included but were not limited to; students; teachers; CareerSource North Florida; the Suwannee Chamber of Commerce and multiple local business and community leaders. All Secondary and Postsecondary CTE programs have advisory councils that meet several times a year, and they provided invaluable input and

- advice throughout the CLNA process. The majority of these stakeholders who participated in the CLNA process are expected to serve as ongoing consultants to the CTE program.
- The mandated CLNA (CTE only) provided the input as to what professions, occupations and trainings were needed in the community.
 - The District and RTC adhere to federal and state record retention policies.

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.

- SCSD utilizes FOCUS® as their integrated Student Information System (SIS) and Workforce Development Information System (WDIS).
- The District has policies and procedures on data collection and offers annual localized training to CTE and AE administrative staff and teachers. Training provided by the district includes, but are not limited to: the annual Summer Workforce Education Leadership training; the annual Back-to-School teacher trainings; and National Reporting System (NRS) new user workshops. Administrative staff also attends FDOE sponsored training and professional development events such as FDOE quarterly webinars, the Florida Association of Career and Technical Education (FACTE) conference and Workforce Education and District Data Advisory Council (WEDDAC) annual conferences.
- The data quality procedures at RTC include:
 - Test scores are entered immediately after the student has completed the testing.
 - FOCUS® errors prohibit unusual test scores or inappropriate assessments entered.
 - Data operator and Director review data frequently to ensure score gains are appropriate and that information is entered correctly.
 - Records of all trained test administrators are kept.
 - There is a test and program orientation established for students.
 - There is a double check between testing coordinators and the data operator to ensure that literacy completion points (LCP)s are obtained correctly and they are entered into the SIS system, FOCUS®.
- Any person who administers a Test of Adult Basic Education (TABE), Comprehensive Adult Student Assessment System (CASAS), and CASAS Goals, along with General Educational Development (GED®) assessment, Postsecondary Education Readiness Test (PERT), End of Course (EOC) or Florida Standards Assessment (FSA) must be certified and trained, either by publishers standards or in accordance with K-12 testing policies for SCSD. Test administrations at RTC are completed by following the test administration manual verbatim in order to ensure fair and consistent testing environment.
- All of the data elements required of their local MIS were included in the system and verified during the on-site review.
- Student electronic files include "release of information" clauses 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 on-site review. No errors were found. All student records were provided by SCSD.

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

- All programs offered within the District utilize FDOE Curriculum Frameworks. Instructors regularly participate in framework reviews and assist in providing input.
- RTC provides 21 Postsecondary options, as well as a Cooperative Education Student Training Plan. CTE programs are available across the county, but with some programs only offered at specific locations and AE services are provided at various times and locations to accommodate the many needs of their adult learners.

- New AE students begin by taking the TABE or CASAS assessment with Assessment Staff. Students receive orientation to the program with general inquiry into students' goals and program expectations. Students read and sign the orientation form as a consensus of expectations, after completion by Jeff Lee or at Branford site by instructors (Frye or Warren), the students keep the form.
- Branford High School and Suwannee Middle School provide introductory courses that vertically align with high school course offerings. Total Occupation List is utilized, as well as, data from CareerSource North Florida.
- Counselors and instructors work collaboratively to adequately prepare students to be market-ready. Counselors and RTC staff collaborate and RTC staff visit schools regularly to share information regarding Postsecondary opportunities. Counselors sponsor college fairs for high school students to assist them with their program and college choice. RTC is planning an Alumni Spotlight that will showcase graduates.
- SCSD and RTC provide information via social media, career fairs, radio, etc., to encourage individuals to continue their education or select a CTE program.
- Some programs allow students to participate in work-based training opportunities. The Industry is invited to provide information to students; and students participate in field trips to acquaint them with varying industries.
- SCSD and RTC encourage dual enrollment agreements between partners. The following dual enrollment agreements exist with RTC: Branford High School; Hamilton County High School; Lafayette High School; Suwannee High School; Madison County High School; Westwood Christian Academy; Melody Christian Academy; Corinth Academy and home-schooled students. The District also has career pathways agreements with North Florida College, Hamilton County High School, Lafayette High School, Madison High School and Taylor County High School.
- AE and CTE instructors participate in ongoing trainings provided by FDOE and FACTE, as well as annual Professional Development Day throughout the district.
- Career and Technical Student Organizations (CTSO) are strongly encouraged. Family, Career and Community Leaders of America (FCCLA), SkillsUSA, and Future Farmers of America (FFA) are active organizations.
- SCSD'S Career and Technical Education Program supports the central idea behind teacher externships as so much has changed in recent years, particularly in occupations affected by technology that retraining their teachers is a valid and desirable goal. Working directly with employers provides teachers a new perspective of the business viewpoint.
- No reasonable services and accommodations are denied to those students who self-declare a disability. SCSD makes every effort to accommodate the special needs of its students. Accommodations may include, but are not limited to, extended time for training, modified tools, special texts, and modified course content. Any student that may need accommodations, contacts Student Services to identify strategies. A Free Appropriate Public Education (FAPE) is available to all students with disabilities upon determination of need.

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

- All inventory criteria set forth by federal, state and local guidelines are included within the inventory management system. The inventory management system was verified during the OSMR.
- All tangible property is listed that has a value of cost as established by Florida Statutes or State Board of Education rules. All equipment is listed that has a value or cost of seven hundred fifty dollars (\$750.00) or more.
- Property inventories are performed annually. It is the principal's duty to designate a person to make an annual inventory of all school property within his/her building(s). This report

includes recommendations for the disposition of obsolete and surplus equipment and equipment beyond economical repair. Such inventory is filed with the District Office either at the time designated in writing by the property control officer or at the time of any principal's resignation.

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

- The Office of Equal Educational Opportunity (OEEEO) is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEEO at 850-245-0511.

F. **RECORDS REVIEW** refers to reviewing the records and documents that evidence compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.

- Size, scope and quality review
- CLNA –Local Market Alignment
- MIS data quality checklists
- District policies and procedures for finance and procurement
- District technology plan
- WDIS user guide
- Student and employee handbooks
- Inventory and procurement records
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign-in sheets, etc.
- District professional development and training records – agendas, sign-in sheets, training materials, etc.
- CTE and AE student data review
- TABE and CASAS proctor records

G. **FINANCIAL** refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management and allowable costs.

- Skyward® is used as the district's Enterprise Resource Planning (ERP) system.
- The district's Financial Office ensures the efficient management of CTE and AE grant funds.
 - Financial reporting
 - Internal Controls
 - Audit requirements
 - Training
- Grant Administrators, Chief Financial Officer (CFO), and the Assistant CFO are responsible for ensuring that costs charged to Federal projects are allowable, necessary, and allocable.
- As grant applications are prepared, the respective grant administrator reviews all proposed expenditures to ensure that they are allowable with respect to the scope, goals, and objectives of that specific Federal project. Furthermore, the grant administrators ensure that all proposed expenditures are in conformance with the limitations or exclusions established within the principles of the Federal award. Specific expenditures are identified such as the type of personnel to be staffed, contracted professional services to be obtained, and large capital purchases (i.e. a vehicle).

- When considering an amendment, the grant administrator considers the impact on originally considered endeavors that will now not be funded due to the amendment.
- Monitoring staff conducted a budget analysis of SCSD's FDOE grants. See Finding 1.

H. **COLLABORATION** refers to the collaborative agreements, articulation agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.

- SCSD has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners include, but are not limited to:
 - CareerSource North Florida (MOU)
 - Lafayette County School Board (articulation)
 - Madison County School Board (articulation)
 - District School Board of Taylor County (Career Pathways Articulation)
 - North Florida College
 - Santa Fe College
 - Tallahassee Community College
 - Suwannee County Chamber
 - Vocational Rehab and Economic Development

VIII. RESULTS

Finding Number	1
Area	Financial
Finding Summary	A grant budget analysis (GBA) was conducted for SCSD for all grants from 2018-2021. There were multiple errors, including overspending, money approved but not spent, and new object codes added to the final expenditure 399 & 499 reports. The object codes found were spread across multiple years and did not match after amendments were submitted.
Finding Detail	<p>The following object codes were identified:</p> <ul style="list-style-type: none"> • Fiscal Year (FY) 2018-19 <ul style="list-style-type: none"> ▪ Rural: <ul style="list-style-type: none"> • Object codes 350; 510; 520 and 642 were all overspent with no budget amendments submitted. ▪ Postsecondary: <ul style="list-style-type: none"> • Object codes 642; 790 and 644 were all overspent with no budget amendments submitted. • FY 2019-20 <ul style="list-style-type: none"> ▪ Secondary: <ul style="list-style-type: none"> • Object codes 644 and 730 were both overspent with no budget amendments submitted.
Citation	Violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."
Recommended/ Anticipated Corrective Action	The Director of Career and Technical Education shall provide a memo of attestation stating the district accepts the finding.
Anticipated completion date:	4/5/2022
Name(s) and Title(s) responsible for corrective action:	Mary Keen- Director of Career and Technical Education
<p>Plan accepted by: Chuck Davis Date: 4/5/2022</p>	
Status of Action Plan (to be completed by FDOE staff)	
<p>Status of CAP: Complete Date: 4/5/2022</p>	

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 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 Suwannee County School District monitoring review on behalf of the department. Special thanks is offered to Mary Keen for her participation and leadership during this process.

APPENDIX A
Suwannee 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: Suwannee County School District					
Program Type: CTE					
Monitoring Year: 2021-2022					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	3	<u>X 10</u>	30
	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	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:					134

Data sources used for calculations: Prior to July 1, 2020

Suwannee County School District
Adult Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Adult Education (AE) Grants					
Agency Name: Suwannee County School District					
Program Type: AE					
Monitoring Year: 2021-2022					
Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	3	<u>X10</u>	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	3	<u>X 8</u>	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education 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 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	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	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	4	<u>X 6</u>	24
	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					126

Data sources used for calculations: Prior to July 1, 2020



Please address inquiries regarding this report to:

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