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

Liberty County School District

February 8 - 12, 2021

Final Report

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Liberty County School District
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, 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 the design, development, implementation and evaluation of a comprehensive system of quality assurance 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).

Additional citations noting pertinent laws and regulations and authority to monitor are located in the 2020-21 Core Monitoring Guide, which is still under review.

III.   QUALITY ASSURANCE CORE MONITORING GUIDE

The Quality Assurance Policies, Procedures and Protocols manual was discontinued after the 2019-20 program year. The Quality Assurance and Compliance section will now operate from the Core Monitoring Guide (CMG). The guide provides a summary of each Core Activity and objective of the monitoring design and process.

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 anytime. There may be circumstances that may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

The monitoring strategy for Liberty County School District (LCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Kyle Peddie, superintendent, Liberty County School District on December 1, 2020. The designated representatives for the agency were Ms. Gay Lewis, CTE and Mr. Terrell Sykes, AE.

The representative of the division conducting the VDMR was program specialist, Mr. Chuck Davis of the Quality Assurance and Compliance section.

V. LIBERTY COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2018-19
CTE (possible duplication at program level): Secondary – 814

AE: 48

The provider was awarded the following grants for FY's 2018-19, 2019-20 and 2020-21:

Finance
FY 2018-19

Grants	Grant Number	Grant Amount	Unexpended
Adult General Education	390-1919B-9CG01	$ 41,948.00	$ 90.21
Perkins Rural	390-1619B-9CR01	$ 28,836.00	$ 450.35
Perkins Secondary	390-1619B-9CS01	$ 4,577.00	$ 1,586.21

FY 2019-20

Grants	Grant Number	Grant Amount	Unexpended
Adult General Education	390-1910B-0CG01	$ 41,948.00	$ 77.06
Perkins Rural	390-1610B-0CR01	$ 28,361.00	$ .00
Perkins Secondary	390-1610B-0CS01	$ 15,195.00	$ 3,644.82

FY 2020-21*

Grants	Grant Number	Grant Amount	Unexpended
Adult General Education	390-1911B-1CG01	$ 41,948.00	$ N/A
Perkins Rural	390-1611B-1CR01	$ 47,418.00	$ N/A
Perkins Secondary	390-1611B-1CS01	$ 14,378.00	$ N/A

* Final project disbursement reports not available at the time of this writing.
Additional information about the provider may be found at the following web address:
https://www.lcsb.org/

VI.   MONITORING ACTIVITIES

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

Onsite Visits
No onsite visits were made during the VDMR process.

Entrance and Exit Conferences
An introductory teleconference for LCSD was conducted on February 8, 2021. The exit teleconference was conducted on February 12, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Gay Lewis	Director, CTE	X	X
Terrell Sykes	Director, AE	X	X
FDOE Monitoring Team			
Chuck Davis	Program Specialist, QAC, FDOE	X	X
Orion Price	Program Specialist, QAC, FDOE	X	

Interviews
LCSD administrators were available via teleconference for interviews, if necessary.

Records Review
Program, financial and administrative records were reviewed. A complete list is provided in section VII, item F. Policies and procedures were reviewed and discussed at various times during the visit.

VII.   RESULTS

A.   **ADMINISTRATION:** refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.

- LCSD has policies and procedures for the writing and completion of grant applications prior to being submitted to FDOE. The AE and CTE directors work with their program coordinators and the district grants facilitator to ensure that all program needs are included within the grant application. Once the grant application draft is complete, the district superintendent must review it before it is sent to FDOE.
- AE and CTE program directors have regular meetings with the grant facilitator and the finance department to monitor grant expenditures.
- The comprehensive local needs assessment (CLNA) included in the LCSD Perkins grants required consultation with numerous community and business leaders. These stakeholders include: students and parents, CareerSource, local advisory committees, and Chipola College.
- LCSD offers ample opportunities for district-wide training and professional development via CTE Coach. AE and CTE administrative staff participate in annual conferences within their program areas, and FDOE sponsored training events and webinars are also attended.

B. **DATA AND ASSESSMENT:** refers to all the components of the data and assessment system, including test administration, test security, data collection and entry and reporting, as well as procedures. The use of data in program decision-making is also explored and commented upon.

- LCSD utilizes the Skyward® system as its integrated management information system (MIS).
- Data staff and program administrators participate in district bi-monthly and quarterly webinars; spring and fall Workforce Education and District Data Advisory Council (WEDDAC) meetings; Florida Association of Career and Technical Education (FACTE) and Division of Career and Adult Education (DCAE) presentations; the annual Adult and Community Education (ACE) conference; and other specialized training offered by DCAE.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- District registration forms include student "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
- LCSD incorporates a data quality review plan prior to submitting any student data to the state. The district director, Mr. Sykes, enters all student data, then reviews the workforce data information system (WDIS) validation report for errors. Once all errors are fixed, the district Systems Analyst submits the survey data to FDOE.
- Upon review of student performance data, it was discovered that one student was reported as earning a literacy completion point (LCP), but did not meet the appropriate benchmarks for the reported attainment. The provider was informed of the error and accepted the error. All student-level data was made available to the FDOE monitoring staff during the VDMR.

FINDING AND ACTION
- Finding B1: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 "Monitoring and reporting program performance."
  - Corrective Action B1: The AE director shall draft and submit an updated written procedure or update their existing procedure in the district data manual regarding the required accurate submission and use of the Post-Test Flag. The procedure should indicate the position responsible for the data entry and maintenance of this data element as well as the triggers that prompt the actions to update this field within the database. If the process for populating this data element is automated, it should include a description of the automated process and the position responsible for maintaining the automated process's integrity.

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

- For guidance and monitoring, the provider works with CTE students to support academic and technical skills by providing a variety of supports for individual students to include CTE Coach and Grad Coach support to ensure meeting graduation standards, tutoring to support academic skills that will improve increase success in core academic classes as well as CTE courses. Students with significant academic needs receive RTI to ensure meeting graduation standards.
- Internship agreements with local employers provide students with work-based learning activities.
- LCSD provides career exploration and career development activities that include LCHS Parent Night, First Responder Day, College Board Big Future Days, and UF Youth Summer Institute. Also, students attend the HOSA Leadership Conference.
- No reasonable services and accommodations are denied to those students who self-declare a disability.
- AE and CTE Instructor Professional Development transcripts were provided.

- Tests of adult basic education (TABE) is used for student skill level assessment. All TABE test proctors are certified as required by FDOE and the testing companies.

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 EDGAR and the UGG is included within the inventory management system. The inventory management system was verified during the VDMR.
- The district has a technology plan that includes policies on new equipment requests, equipment safety/storage and disposal of old inventory.
- There have been no reports of stolen or lost equipment over the previous three fiscal years.

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

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

F. **RECORDS REVIEW:** refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.

- Size, scope and quality review
- CLNA
- MIS data quality checklists
- District policies and procedures for finance and procurement
- District technology plan
- Student and employee handbooks
- Inventory 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.
- AE and 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.

- The district has financial policies and procedures in place to ensure the efficient management of CTE and AE grant funds.
- Skyward® is used as the district's Enterprise Resource Planning (ERP) system. The system allows for shared knowledge of expenditures and real time financial activity. All grant funds and purchase orders are managed within this system.
- Regular finance meetings take place between program directors, the grant facilitator and the finance department. These meetings are to ensure that grant expenditures are being managed properly. Budget amendments are submitted to FDOE if the opportunity arises.

- The district has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants. There is an approval chain that includes the Principal, Director of Instruction, Director of Finance and Superintendent.
- Monitoring staff conducted a budget analysis of LCSD's FDOE grants with no findings.

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.

- LCSD 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:
  - Chipola Workforce Development Board
  - Allied Health
- LCSD has articulation agreements with Chipola College and Tallahassee Community College.

VIII.   REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION
1. Corrective Action Plan – LCSD is not required to complete a CTE Corrective Action Plan.

ADULT EDUCATION
1. Corrective Action Plan – LCSD is required to complete an AE Corrective Action Plan.

IX.   SUMMARY

Once the VDMR 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 resolution items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

On behalf of the department, the monitoring team extends its appreciation to all participants in the Liberty County School District virtual desk monitoring review. Special thanks is offered to Ms. Gay Lewis and Mr. Terrell Sykes for their participation and leadership during this process.

APPENDIX A

Liberty County School District
Career and Technical Education
Risk Matrix

<table>
<tr><td colspan="7">Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE)
Carl D. Perkins Grants

Agency Name: LIBERTY COUNTY SCHOOL DISTRICT
Program Type: CTE
Target Year: 2018-2019
Monitoring Year: 2020-2021</td></tr>
<tr><th>Metric</th><th>Scaling</th><th>Point Value</th><th>Points Assigned</th><th>Weight</th><th colspan="2">Total Metric Points</th></tr>
<tr><td rowspan="4">Number of Years Since Last Monitored</td><td>7 or More Years</td><td>7</td><td rowspan="4">7</td><td rowspan="4">X 10</td><td colspan="2" rowspan="4">70</td></tr>
<tr><td>5-6</td><td>5</td></tr>
<tr><td>3-4</td><td>3</td></tr>
<tr><td>0-2</td><td>1</td></tr>
<tr><td rowspan="4">Total Budget for all Perkins Grants Combined</td><td>Upper Quartile</td><td>7</td><td rowspan="4">3</td><td rowspan="4">X8</td><td colspan="2" rowspan="4">24</td></tr>
<tr><td>Upper Middle</td><td>5</td></tr>
<tr><td>Lower Middle</td><td>3</td></tr>
<tr><td>Lower Quartile</td><td>1</td></tr>
<tr><td rowspan="4">Number of Perkins Grants</td><td>4 or More</td><td>7</td><td rowspan="4">5</td><td rowspan="4">X 8</td><td colspan="2" rowspan="4">40</td></tr>
<tr><td>3</td><td>5</td></tr>
<tr><td>2</td><td>3</td></tr>
<tr><td>1</td><td>1</td></tr>
<tr><td rowspan="2">Change in Management Information Systems (MIS) from Previous Fiscal Year</td><td>Yes</td><td>7</td><td rowspan="2">0</td><td rowspan="2">X 6</td><td colspan="2" rowspan="2">0</td></tr>
<tr><td>No</td><td>0</td></tr>
<tr><td rowspan="2">Agency CTE Program Director Change from Previous Fiscal Year</td><td>Yes</td><td>7</td><td rowspan="2">7</td><td rowspan="2">X 6</td><td colspan="2" rowspan="2">42</td></tr>
<tr><td>No</td><td>0</td></tr>
<tr><td rowspan="5">Unexpended Funds from all Perkins Grants Combined</td><td>Upper Quartile</td><td>7</td><td rowspan="5">3</td><td rowspan="5">X 4</td><td colspan="2" rowspan="5">12</td></tr>
<tr><td>Upper Middle</td><td>5</td></tr>
<tr><td>Lower Middle</td><td>3</td></tr>
<tr><td>Lower Quartile</td><td>1</td></tr>
<tr><td>0</td><td>0</td></tr>
<tr><td rowspan="5">Number of Findings from the Office of the Auditor General</td><td>Upper Quartile</td><td>7</td><td rowspan="5">1</td><td rowspan="5">X 4</td><td colspan="2" rowspan="5">4</td></tr>
<tr><td>Upper Middle</td><td>5</td></tr>
<tr><td>Lower Middle</td><td>3</td></tr>
<tr><td>Lower Quartile</td><td>1</td></tr>
<tr><td>0</td><td>0</td></tr>
<tr><td colspan="5">AGENCY RISK SCORE:</td><td colspan="2">192</td></tr>
</table>

Data sources used for calculations: Prior to July 1, 2019

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

Agency Name: **Liberty County School District**
Program Type: **AE**
Target Year: **2018-2019**
Monitoring Year: **2020-2021**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	7	X10	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	1	X 8	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	1	X 8	8
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	1	X 4	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	1	X 4	4
	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	3	X 6	18
	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	112

Data sources used for calculations: Prior to July 1, 2019

APPENDIX B

Liberty County School District
Corrective Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion
Finding B1: The provider failed to accurately report student data in FY 2018-19. This is in violation of UGG 2 CFR 200.328 "Monitoring and reporting program performance."	Corrective Action B1: The AE director shall draft and submit an updated written procedure or update their existing procedure in the district data manual regarding the required accurate submission and use of the Post-Test Flag. The procedure should indicate the position responsible for the data entry and maintenance of this data element as well as the triggers that prompt the actions to update this field within the database. If the process for populating this data element is automated, it should include a description of the automated process and the position responsible for maintaining the automated process's integrity.	Letter of Attestation	3/31/2021

Plan submitted by (name and title): Terrell Sykes- AE Director
Date: 3/31/2021

Plan accepted by: Chuck Davis   **Date: 3/31/2021**

Status of Action Plan (to be completed by FDOE staff):

Date: 3/31/2021	**Status of Plan Completion: Complete**