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

Northwest Florida State College

November 2 - 6, 2020

Final Report

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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 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 monitoring strategy for the Northwest Florida State College (NWFSC) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Devin Stephenson, president, Northwest Florida State College on August 28, 2020. The designated representative for the agency was Dr. Michael Erny.

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

V.   NORTHWEST FLORIDA STATE COLLEGE

ENROLLMENT:

Fiscal Year (FY) 2018-19
CTE (possible duplication at program level): Post-secondary – 5,425
AE: 646

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	462-1919B-9CG01	$ 135,387.00	$ 10,054.51
Adult General Education	462-1919B-9CG02	$ 230,674.00	$ 25,188.76
Adult Education – IELCE	462-1939B-9CE01	$ 27,258.00	$ 6,026.41
Adult Education – IELCE	462-1939B-9CE02	$ 37,827.00	$ 3,386.53
Perkins Post-secondary	462-1619B-9CP01	$ 267,763.00	$ 45,118.18
Perkins Rural	462-1619B-9CR01	$ 44,707.00	$ 8,253.55

FY 2019-20

Grants	Grant Number	Grant Amount	Unexpended
Adult General Education	462-1910B-0CG01	$ 135,387.00	$ 23,988.51
Adult General Education	462-1910B-0CG02	$ 230,674.00	$ 52,869.27
Adult Education – IELCE	462-1930B-0CE01	$ 27,258.00	$ 6,566.48
Adult Education – IELCE	462-1930B-0CE02	$ 37,827.00	$ 9,148.96
Perkins Post-secondary	462-1610B-0CP01	$ 216,059.00	$ 9,075.21
Perkins Rural	462-1610B-0CR01	$ 47,637.00	$ 884.36

FY 2020-21

Grants	Grant Number	Grant Amount	Unexpended
Adult General Education	462-1911B-1CG01	$ 135,387.00	$ N/A
Adult General Education	462-1911B-1CG02	$ 230,674.00	$ N/A
Adult Education – IELCE	462-1931B-1CE01	$ 27,258.00	$ N/A
Adult Education – IELCE	462-1931B-1CE02	$ 37,827.00	$ N/A

| Perkins Post-secondary | 462-1611B-1CP01 | $ | 239,190.00 | $ | N/A |
| Perkins Rural** | 462-1611B-1CR01 | $ | N/A | $ | N/A |

** Not all grant applications were approved at the time of this writing.

Additional information about the provider may be found at the following web address:
https://nwfsc.edu/

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 NWFSC was conducted on November 2, 2020. The exit teleconference was conducted on November 6, 2020. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Dr. Michael Erny	Dean of Career Education	X	X
Bill Allison	Director of Workforce Development	X	X
Brittany Johnson	Coordinator of CTE	X	X
Dr. Deidre Price	Interim Vice President of Academic Affairs		X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	X

Interviews
NWFSC 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.

- The dean of Career Education is responsible for oversight of the CTE and AE grants and program areas. The dean works closely with the CTE coordinator and AE grant manager to ensure program goals and objectives are met. Data and financial specialists are also consulted as necessary.
- The drafting of their CTE and AE grants is an ongoing, collaborative effort. The dean of Career Education works with the specific program areas to ensure programmatic needs will be included in the upcoming FDOE federal grant applications. The college chain of approval

for a grant prior to being submitted to FDOE is contingent on the items within the application.

- Although not new to CTE, the dean of Career Education is relatively new to his position at NWFSC. The required Perkins comprehensive local needs assessment (CLNA) afforded him an opportunity to conduct a deep assessment of the college's CTE programs, and to learn the needs of local stakeholders and business leaders in the region.
- NWFSC conducts college-wide programmatic training and professional development. AE and CTE administrative staff and instructors participate in annual trainings within their program areas and attend FDOE sponsored training events and webinars.

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.

- NWFSC utilizes Banner® as their management information system (MIS), as well as their enterprise resource planning system (ERP).
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- NWFSC administrative staff and instructors attend FDOE sponsored data webinars and conferences. Local training is also provided to all CTE and AE staff on grant and program data requirements.
- Student data such as literacy completion points (LCPs) are input into Banner® then error reports are run within SAS and SQL Developer. These reports are reviewed by the MIS coordinator; Director of Professional and Workforce Training; ABE Coordinator; and the VP of Institutional Research, Analysis, and Planning. Any errors are fixed prior to submission to the state.
- NWFSC has internal controls that ensure administrative staff has access to only the specific part(s) of the MIS required by their job description. Program directors, staff assistants, deans and the VP of Academic Affairs have access to retention reports, enrollment numbers and completion rates as it pertains to their program area.

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

- NWFSC offers CTE programs at multiple campuses throughout their service area. The college supports AE services for neighboring Walton and Okaloosa counties.
- The college planned to discontinue their AE program, but at the request of the state they opted to revise their operations and continue the program. A complete overhaul of the program included: limited sites/locations; consolidated staff; an increase in targeted student outreach; and a larger focus on attracting students who may have left the program due to the ongoing COVID-19 pandemic.
- The Perkins CLNA uncovered multiple strengths within the CTE program, but also found opportunities to better serve students and the local community. Multiple programs will eventually be discontinued, while other programs will be the focus of a stringent overhaul to meet the future needs of the local workforce.
- NWFSC has an Accommodation Office that works directly with students who self-declare a disability. No reasonable services and/or accommodations are denied to those students.
- A focus of the AE program is to increase the number of students who are working towards their GED® while concurrently earning CTE credits. AE instructors and counselors receive cross-functional training in CTE services so they are able to speak to their students about CTE program offerings.

- Tests of adult basic education (TABE) and the comprehensive adult student assessment system (CASAS) are used for student skill level assessment. All TABE and CASAS 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.
- Photographic evidence of inventory was reviewed as part of the VDMR process.
- The district has a technology plan that includes policies on new equipment requests, equipment safety/storage and the disposal of old inventory.
- Police reports are filed with the campus police department for any piece of equipment that is thought to be missing or stolen. 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 providers 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. A sampling of financial and programmatic records is reviewed.

- Size, scope and quality review
- CLNA
- MIS data quality checklists
- TABE and CASAS certifications
- Inventory records
- Policies and procedures for finance and procurement
- College technology plan
- Student and employee handbooks
- Procurement records
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign in sheets, etc.
- AE and CTE student data review
- Time and effort reports
- Student progression plans

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.

- Banner® is used as the college's Enterprise Resource Planning (ERP) system. Chrome River is an application within Banner® that provides program directors and coordinators with real time expenditure and financial reports. Travel and procurement records are also housed within Chrome River.

- NWFSC has financial policies and procedures in place to ensure the efficient cash management of CTE and AE grant funds. There is a multi-tier approval process for all expenditures charged to the CTE or AE grants. The approval process is dictated by the price of a purchase.
- Grant funded equipment is also managed within Banner®. The college conducts an inventory of equipment annually.
- The dean of Career Education and program directors have regular meetings with administrative staff to discuss the current financial standing of their grants. Budget amendments are submitted to FDOE if the opportunity arises.
- Monitoring staff conducted a budget analysis of NWFSC's FDOE grants and final expenditure reports. Upon review, all expenditures reported to the FDOE comptroller were in alignment with the college's previously approved CTE and AE grants.

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

- NWFSC 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 Okaloosa Walton
  - Okaloosa County School District
  - Walton County School District
  - Santa Rosa County
  - Collegiate High School at NWFSC
  - Gateway Academy

VIII.   REQUIRED RESOLUTION ACTIVITIES

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

ADULT EDUCATION
1. Corrective Action Plan – NWFSC is not 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 Northwest Florida State College virtual desk monitoring review. Special thanks is offered to Dr. Michael Erny for his participation and leadership during this process.

Northwest Florida State College
Career and Technical Education
Risk Matrix

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

Agency Name: **Northwest Florida State College**
Program Type: **CTE**
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	**3**	X 10	**30**
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	**1**	X 8	**8**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	**3**	X 8	**24**
	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 CTE Program Director Change from Previous Fiscal Year	Yes	7	**7**	X 6	**42**
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	**7**	X 4	**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	**5**	X 4	**20**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
			AGENCY RISK SCORE:		**152**

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

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

Agency Name: **Northwest Florida State College**
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	3	X10	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	5	X 8	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	7	X 8	56
	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	7	X 6	42
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	7	X 4	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	5	X 4	20
	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	X 6	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	**240**

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