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

Florida SouthWestern State College

November 16-18, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education
Florida SouthWestern State College
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 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.

Florida SouthWestern State College (FSSC) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was initially sent to Dr. Jeffery S. Allbritten, president, on July 14, 2021. The designated representative for the agency was Dr. Thomas Norman. The division's representative conducting the OSMR was the program specialist, Charles Davis of the Quality Assurance and Compliance section.

V.   Florida SouthWestern State College

ENROLLMENT:
CTE (possible duplication at program level): Post-secondary – 5,176

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

FY 2018-19

Grants	Grant Number	Grant Amount	Unexpended
Perkins Post-secondary	362-1619B-9CP01	$ 692,858.00	$ 16,840.82

FY 2019-20

Grants	Grant Number	Grant Amount	Unexpended
Perkins Post-secondary	362-1610B-0CP01	$ 812,840.00	$ 9,260.92

FY 2020-21

Grants	Grant Number	Grant Amount	Unexpended
Perkins Post-secondary	362-1611B-1CP01	$ 202,070.00	N/A
CARES Act - Rapid Credentialing	362-1230A-1CR01	$ 682,218.00	N/A

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

VI.   MONITORING ACTIVITIES

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

Onsite Visits
Onsite visits were made during the OSMR process.

The entrance meeting for FSSC was conducted on November 16, 2021. The exit meeting was conducted on November 18, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Dr. Thomas Norman	Vice Provost Workforce Programs	x	x
Dr. Eileen DeLura	Provost	x	x
Jill DeValk	Coordinator, Academic and Grant Programs	x	x
Dr. Martin McClinton	Vice Provost, Academic Affairs	x	x
Esther Puig Torres	Director, Budget	x	x
FDOE Monitoring Team			
Chuck Davis	Program Specialist, QAC, FDOE	x	x
Michael Swift	Program Specialist, QAC, FDOE	x	
Orion Price	Program Specialist, QAC, FDOE	x	x

Interviews
FSSC 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 22 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 Vice Provost Workforce Programs is required to plan, develop, implement and evaluate the career and technical education program.
- Dr. Thomas Norman, Vice Provost Workforce Programs provides budget requests, and reviews budget performance.
- As part of the required comprehensive local needs assessment (CLNA), CTE administrative staff consulted with numerous individuals and entities across the college's service area. Those stakeholders included but were not limited to; students; teachers; CareerSource Southwest Florida; and multiple local business and community leaders. All post-secondary 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 provided the input as to what professions, occupations and trainings were needed in the community.

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

- FSSC utilizes Banner® as their integrated Student Information System (SIS) and Workforce Development Information System (WDIS).
- Under the terms of the Family Educational Rights and Privacy Act (FERPA), the college has established the following as directory information:
  1. Student's name
  2. Major
  3. Date(s) of enrollment
  4. Degree(s) and honors earned with dates awarded
  5. Participation in officially recognized activities or sports
  6. Enrollment status (e.g., full-time or part-time student status)
  7. Previous colleges attended
  8. Photographs
  9. Awards
- The current Student Database Data Directory was provided as evidence of procedures for the collection, verification, analysis and reporting of student data.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- Samples of CTE student data was reviewed and verified for accuracy as part of the OSMR. All student records were provided by FSSC.

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

- FSSC serves a five-county regional area offering 25 fundable programs at three campus locations and one regional center.
- The Career Pathways Program is a collaborative effort between FSSC and the five school districts that make up the Southwestern Florida region.
- The enrollment support team consists of an Enrollment Counselor, Student Success Advisor, and Financial Aid Specialist.
- CTE instructors participate in ongoing trainings provided by FDOE, as well as annual professional development throughout the college. FSSC eLearning is an online system that allows employees to track their profesional growth.
- The college established a Teaching and Learning Center (TLC) in 2006 to provide professional development programs, services, and resources to all faculty and staff at FSSC in support of the College's mission.
- The Stage Technology Certificate Program aims to provide students with technical knowledge and skills for employment in the live entertainment industry. This 17 credit hour program combines rigorous academic content with practical, hands-on experience and focuses on stagecraft, lighting, and sound production for theatre, concerts, dance, and industrial theatre. The certificate helps prepare graduates for careers such as:
   Scenic Carpenters/Technicians
   Lighting Designers/Assistants
   Lighting Technicians
   Audio/Visual Technicians
   Live Audio Engineers
   Scenic Designers/Assistants
   Stage Managers
   Technical Directors
   Production Managers

- Students in all Digital Arts, Stage Technology, and Music Production courses focus on project-based learning. The Digital Art workforce is based around the idea of making things. We utilize project-based assignments to demonstrate how students will be asked to make things in a workplace setting. Since there is quite a bit of freelancing in the digital art workforce, one of the main skills that we emphasize is project management. It is not enough to have a great idea, but students need to see that idea through to the end. We place great emphasis on planning documents and reflection throughout every project. One example of a complex project is: create an original game. Students run through every game creation stage, from brainstorming, play-testing, and final reflection. FSSC emphasizes process over the end result.
- No reasonable services and accommodations are denied to those students who self-declared a disability. The college works with disabled students to ensure their individual needs are being met.

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

- All inventory criteria set forth by federal, state and local guidelines are included within the inventory management system. The inventory management system was verified during the OSMR.
- Property custodians are the department's assigned budget administrators and are an employee of the college who generally is a person in a supervisory position with direct control of one or more budget accounts.
- Capitalized Personal Property represents any movable personal property (furniture, machinery, fixtures, equipment, supplies and similar items) costing $5,000 or more with an expected useful life of one year or more. These items are formally capitalized on the college's general ledger and depreciated over their useful life. These items are reported and controlled through the use of the college fixed asset system.
- The fixed asset system is an automated process for recording the acquisition, location, custody, original cost, depreciation, and ultimate disposition of College personal property.
- All Capitalized Property costing $5,000 or more is recorded in the fixed asset system and permanently identified (tagged) with a property number decal. The Office of Financial Services is responsible for the tagging of all fixed assets.

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

- The Office of Equal Educational Opportunity (OEEO) 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 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
- College policies and procedures for finance and procurement
- College 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 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.

- Banner® is used as the college's Enterprise Resource Planning (ERP) system.
- The district's Business & Fiscal Services Accounting Department Procedures ensures the efficient management of CTE and AE grant funds.
  - Financial reporting
  - Internal Controls
  - Audit requirements
  - Training
- All requests or responses from an outside agency to perform a funded project that involves (1) participation by faculty, staff, or students or (2) the use of campus facilities must be referred to the FSSC Office of Sponsored Programs, a division of Team AASPIRE (Accountability, Assessment, Sponsored Programs, Institutional Research and Effectiveness).
- The Office of Budget and Financial Planning handles the routing of all award monies received through the grant agency, sets up the budget, and handles all financial reporting required.
- The majority of the College obligations are initiated by a budget administrator or department head by a Purchase Requisition, a form that can be completed online via the College Portal.
- The Purchasing staff check the requisitions for the following: correctness of financial coding, description of item(s) requested, and fund availability. In Banner®, the POs are assigned a consecutive 7-digit number preceded by a P. At the beginning of the next fiscal year, the first PO issued will be the next consecutive number after the last PO number issued the preceding year. When a PO is produced, an encumbrance is generated in Banner®.

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.

- FSSC 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 Southwest Florida
  - Charlotte Technical College
  - Florida Gulf Coast University
  - Hodges University
  - Horizon Council
  - Lee County Economic Development Office
  - Geographic Chambers of Commerce
- Each year, more than 3,500 students across their five-county district experience college life through the Dual Enrollment program at Florida SouthWestern State College. Over the years, thousands of students have taken college courses towards their high school and college degrees. Some students choose to take a few courses to get a head start on their college coursework, while others complete the requirements of earning an Associate of Arts degree

while they are graduating from high school. Students have the option of taking classes at their high school, on any of FSSC's campuses, or online.

VIII.   RESULTS

Finding Number	1
Area	Financial
Finding Summary	The provider failed to request a budgetary amendment for an expenditure not previously approved in their original grant application.
Finding Detail	Monitoring staff conducted a grant budget analysis of FSSC FDOE grants. Upon review, errors were discovered within the CTE Perkins 2018-19 & 2019-20 budget narratives, resulting in the DOE 399 (final expenditure reports) to include payments towards object codes that FDOE did not approve. As a result, no budgetary amendment was submitted to FDOE for approval. Although it was an error in the budget narrative, the discovery will still result in a finding. Therefore, no repayment of funds is required at this time.
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 Vice Provost shall provide a memo of attestation stating the college accepts the finding.
Anticipated completion date:	12/9/2021
Name(s) and Title(s) responsible for corrective action:	Dr. Thomas Norman, Vice Provost Workforce Programs

Plan accepted by:	**Chuck Davis**	**Date:12/13/2021**
Status of Action Plan (to be completed by FDOE staff)		
Status of CAP: Complete		**Date:12/13/2021**

Finding Number	**2**
Area	Data and Assessment
Finding Summary	The provider failed to accurately report student completer data to FDOE.
Finding Detail	Monitoring staff conducted a student data audit of the provider's CTE completers. Upon review it was determined that a student was reported as having earned an industry certification, but the students' test records did not support those claims. Monitoring staff verified each student's test transcripts for accuracy as part of the onsite monitoring review.
Citation	UGG 2 CFR 200.328 "Monitoring and reporting program performance."
Recommended/ Anticipated Corrective Action	The Vice Provost will provide a memo of attestation to the monitoring staff that outlines what steps were taken to correct the data inaccuracies, and what ongoing training will take place to prevent future errors.
Anticipated completion date:	12/9/2021
Name(s) and Title(s) responsible for corrective action:	Dr. Thomas Norman, Vice Provost Workforce Programs

Plan accepted by:	**Chuck Davis**	**Date: 12/13/2021**

Status of Action Plan (to be completed by FDOE staff)
Status of CAP: Complete   **Date:12/13/2021**

Finding Number	**3**
Area	Technology and Equipment
Finding Summary	Equipment not properly tagged.
Finding Detail	During the monitoring review, several pieces of equipment were not in the location indicated on the inventory record.
Citation	This is in violation of 2 CFR 200, UGG §200.313.
Recommended / Anticipated Corrective Action	Equipment purchased with grant funds must be properly tagged with an asset identification number and kept in the location listed in the inventory management system in order to comply with state and federal requirements. Updated inventory records that included correct locations for all pieces of grant-funded equipment were provided during onsite review.
Anticipated completion date:	Completed onsite 11/18/2021
Name(s) and Title(s) responsible for corrective action:	Dr. Thomas Normank, Vice Provost Workforce Programs
Plan accepted by: **Chuck Davis** **Date: 11/18/2021**	
Status of Action Plan (to be completed by FDOE staff)	
Status of CAP: **Complete** **Date:11/18/2021**	

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 Florida SouthWestern State College monitoring review on behalf of the department. Special thanks is offered to Dr. Thomas Norman for his participation and leadership during this process.

Florida SoutWestern 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: **Florida SouthWestern State College** 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	7	X 10	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	5	X 8	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins 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	7	X 6	42
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	5	X 4	20
	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:	**200**

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

Please address inquiries regarding this report to:

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