



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

The School Board of Highlands County

September 20-24, 2021

Final Report

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Florida Department of Education
Division of Career and Adult Education

**The School Board of Highlands County
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.

The School Board of Highlands County monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Brenda Longshore, superintendent, on July 14, 2021. The designated representative for the agency was Dr. Nia Campbell. The division's representative conducting the VDMR was program specialist, Chuck Davis of the Quality Assurance and Compliance section.

V. The School Board of Highlands County

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Post-secondary – 5,933

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

Finance

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Rural	280-1619B-9CR01	\$ 72,276.00	\$ 2,031.35
Perkins Secondary	280-1619B-9CS01	\$ 183,217.00	\$.00

FY 2019-20

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Rural	280-1610B-0CR01	\$ 71,241.00	\$ 9,515.92
Perkins Secondary	280-1610B-0CS01	\$ 217,035.00	\$ 88,183.25

FY 2020-21

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Rural	280-1611B-1CR01	\$ 56,898.00	\$ 40,258.24
Perkins Secondary	280-1611B-1CS01	\$ 251,883.00	\$ N/A

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

<https://www2.highlands.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

No onsite visits were made during the VDMR process.

Entrance and Exit Conferences

The entrance conference for The School Board of Highlands County was conducted on September 20, 2021. The exit conference was conducted on September 24, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Dr. Nia Campbell	Assistant Superintendent Secondary Education	x	x
Mike Averyt	Assistant Superintendent Business Operations	x	x
Darrell Layfield	Director of MIS	x	x
Jon Million	Data Scientist	x	x
Rebekah Wills	CTE Resource Teacher	x	x
FDOE Monitoring Team			
Chuck Davis	Program Specialist, QAC, FDOE	x	x
Michael Swift	Program Specialist, QAC, FDOE	x	x
Orion Price	Program Specialist, QAC, FDOE	x	x

Interviews

The School Board of Highlands County (SBHC) administrators were available via teleconference 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 nineteen 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.

- It is the responsibility of the Grants Manager, Dr. Nia Campbell, under the direction of the Superintendent, to implement the grants administration policy and to provide procedures that detail the grant proposal seeking process and the proper execution, management, and close-out of the Board's grant awards; and report on the submission and status of grants in a manner that assures transparency and accountability to the Board, grantors, and the public. The grant administration procedures apply to all grants pursued by School Board personnel and awarded to the School Board of Highlands County, and define the roles and responsibilities of employees pertaining to the management of external funding and compliance with prescribed grant and Board requirements.
- The school board, superintendent, finance department and grants and special projects manager are the "key players" in the management and administration of grant funded projects.

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.

- The School Board of Highlands County (SBHC) utilizes the Skyward® system as its integrated management information system (MIS).
- The SBHC maintains educational records in accordance with state and federal laws. Copies of SBHC Student Records Policy are available for public use during school hours.
- All social security numbers are protected by federal regulations Family Educational Rights and Privacy Act (FERPA). To protect identity, the SBHC secures student social security numbers from unauthorized access and assign a unique student identification number. This unique identification number is then used for all associated educational purposes.

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

- Students develop and maintain a 4-year plan which correlates to their post-secondary/career plans. All students are provided a program of studies listing all available courses. Students individually meet with their counselors or lead teacher to discuss and plan the courses that will meet their career objectives. Students, with the assistance of their guidance counselors and CTE teachers, select courses that align with interests and career goals.
- The CLNA reflects 13 career clusters offered, 72 CTE courses available, 615 students reached and 356 certificates earned.
- Beginning with the 2019-2020 school year, students were able to earn a standard high school diploma through the Career and Technical Education (CTE) pathway option.

- 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 VDMR.
 - The district has a technology plan that includes policies on new equipment requests, equipment safety/storage, and old inventory disposal.
 - There have been no reports of stolen or lost equipment over the previous three fiscal years.
- E. ACCESS AND EQUITY** refer to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation, and completion of programs.
- The district has the following elements in place to meet the GEPA requirements: Special Programs and Procedures manual for Exceptional Student Education, ADA regulation compliance officer, ADA committee meetings to monitor district compliance, IDEA regulation compliant, ADA and safety compliance officer, School Board policy against discrimination (Highlands County School Board policy 2260.01)
 - It is the policy of The School Board of Highlands County not to discriminate against employees or students by either deliberate or inadvertent bias based on race, color, sex, age, national origin, handicap, marital status, or religion. It is further recognized that a passive policy of nondiscrimination will not of itself result in providing opportunities to those individuals who might otherwise be adversely affected. It is for this reason that The School Board of Highlands County commits itself to a program of affirmative action designed not to discriminate against anyone.
- 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
 - 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.
 - 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 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.
- Under Florida Statutes, Florida Department of Education Rules and SBHC Policies, the superintendent or his authorized representative(s) are the only persons empowered to make purchases and encumber funds. Persons authorized to encumber and expend SBHC funds (sign SBHC purchase orders) are:
 1. Coordinator of Purchasing/Assistant Superintendent for Business/Operations/Director of Finance – No approval or signature limit except budget capacity.
 2. Superintendent – No approval or signature limit except budget capacity.
 3. Deputy Superintendent – Approval or signature of PO’s less than \$15,000.00
- If entry of a purchase order will cause a budget line to go to a negative balance, the system will not allow the purchase order to be entered. The SBHC Purchasing Card Program is designed to improve efficiency in processing low dollar, and other purchases that meet the requirements of the SBHC purchasing policies.
- Monitoring staff conducted a budget analysis of SBHC’s FDOE grants. Upon review, the following non-compliance findings were discovered:

(G1): CTE 2018-19, 2019-20, and 2020-21 budget narratives which resulted in the DOE 399 (final expenditure report) to include the following:

 - Expenditures in several object codes (120; 220; 240; 690 and 390) were not previously approved by FDOE, and no record of any budgetary amendments were submitted to FDOE to authorize the new object codes. Expenditures in object codes (120;160; 210; 220; 230; 642 and 644) were overspent.
 - Expenditures in the above-referenced object codes are deemed allowable under this federal program. No cost recovery is required.

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.

- SBHC has multiple collaborations and/or MOUs within the local community. They often offer additional educational and job experiences to students within the district. The current partner is but not limited to:
 - CareerSource Heartland
 - Economic Development Management Office
- SBHC has an articulation agreement with South Florida State College.
- Agriculture- Students work through external apprenticeship programs with local businesses.
- Veterinary Assisting students must complete 250 hours of practical skills with a licensed veterinarian. Students work with large and small animal veterinarians in the field and at local animal hospitals.

- SBHC partners with local farmers and ranchers that help to assist with their educational needs. For example, Lykes Brothers Citrus Company assists with maintaining their half-acre grove located on campus. They supply the equipment and materials needed and speak to the students about the different aspects of the industry and managing and maintaining a healthy grove. Lykes also donated several thousand young citrus trees to the program. Students decided to sell the trees as a fundraiser for their program. It was a huge success.
- Lykes Brothers Cattle Company also has partnered with the school to help students select and purchase beef show cattle for their county fair. Lykes always offers the calves at below market price to help with the students' budgets. The company always goes above and beyond and donates a calf to the program to be shown and auctioned at the fair. During the fair and auction, Lykes also bids and purchase several animals from the program.
- Glisson's Animal Supply is the local feed store and the owner partners with all their schools' Ag programs in the district to supply free feed for a chapter animal. This saves the program thousands of dollars in expenses for their large animal projects.
- Florida Nursery Growers and Landscape Association (FNGLA) aided in more than half the money to refurbish two greenhouses at the school. They also help to pay for some of the irrigation costs needed to fix and repair broken water lines in the Ag department. Somer's Irrigation (a locally owned and operated store) covers the remaining costs that FNGLA does not cover.
- Highlands County Farm Bureau Board donates funds each year to each of the FAA chapters in the middle and high schools. They also sponsor students and one adult to travel to Tallahassee to participate in Farm Bureau Legislative Days. They assist with judging our local FFA Career Development Event competitions for sub-districts and districts.
- Florida Grove Hedger has taken the responsibility for trimming and hedging the school grove at their expense.
- M E Stephens & Sons Fruit Co Inc. harvests and hauls the oranges from the grove to be processed into juice. The company gives fruit sales back to the Ag department.
- Representative, Dr. Cary Pigman was informed there was a need for a livestock trailer for one of their school's Ag programs. He immediately donated a gently used trailer to the program that he had at his property.
- Hillary Peat is a local soil company that graciously donates potting soil to each Ag department throughout the year.
- Happiness Farms donates caladium bulbs to the Ag programs each year. Teachers may use the bulbs as teaching lesson, as a fundraiser, or both.
- There are community members that assist with leading showmanship clinics for their cattle, swine, goat, and even small animal exhibitors.
- Community members also help to coach and lead competitive Career Development Event (CDE) teams with their FFA chapters.
- One of their Ag departments hosted an Ag Career Day where local businesses brought equipment and materials to the school for the students to gain a better understanding of their different Ag industries.
- SBHC Ag department and FFA Chapters also go and serve in the community through the following events: Ag Literacy Day- students read and teach about agriculture to elementary students, AgVenture- students assist third graders through different stations that teach them about the different agriculture commodities in Highlands

County, community service projects that consist of landscaping local parks, arranging and participating in hosting petting zoo at local elementary schools.

- Their teachers work great with their community members to give and receive assistance throughout their programs. They continue to work hard to build great relationships with different businesses and community members in their county.

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 SBHC FDOE grants. Upon review, errors were discovered within the CTE Perkins 2018-19 & 2019-20, budget narratives, resulting in the DOE399 (final expenditure reports) to include payments towards object codes that FDOE did not approve. 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 CTE director shall provide a memo of attestation stating the district accepts the finding.
Anticipated completion date:	10/13/2021
Name(s) and Title(s) responsible for corrective action:	Dr. Nia Campbell, Assistant Superintendent of Secondary Education
Plan accepted by: Chuck Davis Date: 10/13/2021	
Status of Action Plan (to be completed by FDOE staff)	
Status of CAP: Closed Date:10/13/2021	

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 The School Board of Highlands County monitoring review on behalf of the department. Special thanks is offered to Dr. Nia Campbell for her participation and leadership during this process.

APPENDIX A

The School Board of Highlands County
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: The School Board of Highlands County					
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	5	<u>X8</u>	40
	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	7	<u>X 6</u>	42
	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	1	<u>X 4</u>	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					168

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



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