FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

Quality Assurance and Compliance
On-site Monitoring Review
for
Career and Technical Education
and
Adult Education

Broward College

November 28 – December 19, 2022

Final Report

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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 Broward College (BC) monitoring strategy was determined to be an on-site monitoring review (OSMR). Notification was initially sent to Mr. Gregory Adam Haile, president, on July 30, 2022. The designated representative(s) for the agency Ms. Christine Honeycutt. The division's representative conducting the OSMR was the program specialist, Michael Swift of the Quality Assurance and Compliance section.

V.   BROWARD COLLEGE

ENROLLMENT:
CTE (possible duplication at program level): Post-secondary – 38,880
AE (No reported information at the time of this writing)

Finance
The provider was awarded the following grants for fiscal year's (FY) 2019-20, 2020-21 and 2021-22

FY 2019-20

Grants	Grant Number	Grant Amount	Unexpended
Perkins Post-secondary	062-1610B-0CP01	$2,500,750.00	$ 799.31

FY 2020-21

Grants	Grant Number	Grant Amount	Unexpended
Perkins Post-secondary	062-1611B-1CP01	$ 2,163,105.00	$ 60,982.30

FY 2021-22

Grants	Grant Number	Grant Amount	Unexpended
Perkins Post-secondary	062-1612B-2CP01	$2,009,388.00	$ 89,390.73
Adult Education - AGE	062-1912B-2CG01	$ 1,295,376.00	N/A

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

On-site Visits
The monitoring team visited the following campuses:
- Cypress Creek Administrative Building
- North Campus
- Lee YMCA/Mizell Community Center
- A. Hugh Adams Central Campus
- Judson A Samuels South Campus

<u>Entrance and Exit Conferences</u>
The entrance conference for BC was conducted on November 29, 2022. The exit conference was conducted on December 19, 2022. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Christine Honeycutt	Dean, CTE Support Services	X	X
Gregory Adams	Senior Director, Grants Compliance	X	X
Nadine Kingston	Senior Director, Grants Accounting	X	
Yolanda Brown	Associate Vice President, Adult & Community Education		X
Olivia Sarson	Senior Director, Adult Education		X
Irma Avila	CTE Support Specialist	X	
Jeremy Krause	Senior Director, Title V Bridges Project	X	
Renato Cortez	Associate Dean, CTE Support Services	X	
Claudia Alvarado	Senior Director, Workforce Enrollment Solutions	X	
Jeff Albright	Senior Director, Contract Negotiations Procurement	X	
FDOE Monitoring Team			
Chuck Davis	Program Specialist, QAC, FDOE	X	X
Michael Swift	Program Specialist, QAC, FDOE	X	X

<u>Interviews</u>
BC administrators were available for interviews, if necessary.

<u>Records Review</u>
Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, section F. 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 BC CTE and AE grants are managed by two separate groups of experienced administrators, but both program areas follow the same process for the drafting, approval and submission of their grants to FDOE.
- The AE and CTE grant managers have regular meetings throughout the program year with stakeholders and administrative staff to ensure that the programmatic and fiscal objectives of their grants are being achieved. Any deviation(s) from their previously approved grant will result in an amendment being submitted to their FDOE grant manager. All amendments are based off program needs and the current financial standing of a grant.
- As part of the required comprehensive local needs assessment (CLNA), postsecondary CTE administrative staff consulted with numerous individuals and entities across the BC service area. Representatives from special population groups also provide insight into the workforce needs and opportunities for those students. The list of stakeholders includes, but is not limited to:

- o Broward County Public Schools
- o BC students, faculty and staff
- o CareerSource Broward
- o Broward Chamber of Commerce
- o Local businesses
- o Community leaders
- o Broward Unlimited Potential (UP)
- o PACE Center for Girls
- o Broward Housing Authority
- o Numerous CTE advisory councils
- In addition to ongoing advisory council meetings throughout the program year, all stakeholders who participated in the CLNA process will continue to serve as consultants to the CTE program.
- BC conducts ongoing professional development and training to ensure all CTE and AE administrative staff are up to date on any changes that come from the federal and/or state level Department of Education. FDOE sponsored training events are also attended. BC also provided documentation supporting college-wide instructional training and professional development.

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.

- BC utilizes the College Information Database (CID) as its integrated Management Information System (MIS) and student information system (SIS). CID is formatted to meet all FDOE requirements as defined by the Data Dictionary. In addition, BC submitted a "Collection of Data Elements" attestation stating that all required elements required of their local MIS are in place.
- The National Student Clearinghouse's StudentTracker® is used as a national database to track statistics such as enrollment trends and patterns, transfer student trends, federal reporting requirements, and a host of other useful data from colleges and universities across the country. The StudentTracker® also offers informative tools to assist in research and analysis of student data from participating universities and colleges.
- BC has written procedures for the collection, verification, analysis and reporting of student data. The Florida College System Database Submission procedures are also adhered to and followed.
- BC has specific staff members responsible for the accurate collection, review and submission of student data to FDOE. Program staff and administrators work under the supervision of the Assistant Director of Institutional, State and Federal Reporting. Job descriptions were provided by BC.
- Under the supervision of the State Reporting Coordinator, program staff meet regularly to review, verify and/or reconcile the accuracy of student data prior to submission to FDOE.
- BC conducts annual training on topics such as state database requirements, current FY reporting timelines and the roles and responsibilities of those tasked with federal and state data reporting. Administrative staff also attend FDOE sponsored training and professional development events such as FDOE quarterly webinars, the Florida Association of Career and Technical Education (FACTE) conference and Management Information Systems Advisory Taskforce (MISATFOR) meetings.
- Samples of CTE student data were reviewed and verified for accuracy as part of the OSMR. All student records were provided by BC.
  - o Upon review of the student data, all records reported to FDOE were consistent with the local records supplied by BC.
  - o No AE student data was available for review due to the infancy of the program.

- Student intake forms include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).

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

- BC offers CTE and AE programs at multiple campuses and satellite sites across the county. The recently opened AE program offers ABE courses at the Lee YMCA/Mizell Community Center. BC will begin its first Integrated English Literacy and Civics Education (IELCE) cohort in spring 2023.
- In conducting their CTE CLNA, BC assessed their local Labor Market Alignment (LMA) to determine what programs best suit the needs of the local community and workforce. The college supports programs and services that are included in the Florida Statewide and Broward County Regional Demand Occupations list. The LMA review also afforded BC the opportunity to phase out programs and begin incorporating new programs that better align with local workforce needs.
- BC conducts pointed and targeted outreach to the local communities within their service area. The aforementioned AE program meets the needs of local residents, as the YMCA location provides direct access to instruction in one of Broward's most underserved and impoverished communities.
- BC has close relationships with local religious communities, homeless shelters, food banks and other civic organizations. Programs such as Seahawk Outreach, LifeNet 4 Families and Nourishment Florida assist students facing housing, food and/or financial hardships.
- BC works with local Broward County Public Schools (BCPS) high schools to offer career exploration services in an attempt to promote postsecondary offerings through the college. In addition to their collaboration with BCPS, BC has numerous programs in place to reach out to non-traditional, minority and underserved students across their service area.
- All Adult General Education (AGE) students who are supported by federal funds are required to be pre and post-tested with the Test for Adult Basic Education (TABE). Students are then placed in the appropriate class level based on their performance on the TABE pre-test. Post-test scores will then be used to measure the student's progress from one ABE level to another.
- All proctors of the TABE are trained and certified, as required, by the state and the appropriate testing companies. Local policies and procedures on testing are also in place.
- There is a strong effort to strengthen the relationship between AE and Workforce programs. Supply Chain Warehouse Operator, Information Technology and Microsoft Office Specialist are offered as part of BC's Integrated Education and Training (IET) program to prepare AE learners for in-demand job opportunities, in addition to their IELCE or ABE curriculum.
- In accordance with WIOA, BC has a memorandum of understanding (MOU) with CareerSource Broward to provide workforce training, employment assistance and other services for those interested in workforce programs and/or literacy services.
- BC has a dual enrollment agreement in place with BCPS that offers college-ready high school students the opportunity to earn postsecondary college credits in addition to their secondary instruction.
- BC offers students multiple opportunities to participate in additional learning activities outside of the classroom.
  - BC serves is a sub-recipient of Seminole State College (SSC) Apprenticeship and Pre-apprenticeship grant funds offered through FDOE.
  - Programs such as Dental Hygienist allow students to earn experience and clinical hours by performing dental services for the general public.
  - IELCE students are able to participate in IET programs that better prepare them for transition into the workforce and/or into a post-secondary CTE programs.
- BC conducts program vitality reviews every three years. This, in conjunction with their CLNA, helps administrative staff better understand classroom and workforce trends effecting

their program offerings. Data reviewed includes student enrollment and retention, job offerings per program area and student success based off demographics.

- BC offers ample professional development and training to AE and CTE administrators and staff. Instructors also participate in ongoing trainings provided by FDOE, as well as annual professional development through the college. Program-specific training and/or certification is also completed as required.
- No reasonable services and accommodations are denied to those students who self-declare a disability. Self-identifying students work with the BC Accessibility Resources office to establish their Individual Education Program (IEP), which includes all accommodations the student is able to take advantage of in the classroom. Teacher observations and annual performance summaries help to ensure that the student's needs are continually being met.
- Policies, procedures and accommodations are in place to ensure compliance with the General Education Provision Act (GEPA) to guarantee equitable access and/or participation in AE and CTE programs regardless of gender, race, national origin, color, disability or age.
- BC has numerous agreements in place to ensure that program offerings and services extend to all special populations across their service region. Some of these community partners include:
  - o Broward County Housing Authority
  - o Jack and Jill Children's Center
  - o Urban League Broward County
  - o Feeding South Florida – Pembroke Pines Homeless Association
  - o Broward UP – Homelessness engagement
  - o United Way of Broward County
  - o Fort Lauderdale Independence Training and Education (FLITE) Center – Services for youth aging out of foster care

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.
- BC has policies and procedures in place to ensure appropriate safeguards, maintenance and disposal of grant-funded equipment.
- Internal controls and procedures govern the management of grant-funded equipment that is permanently or temporarily moved from its permanent location. Temporary property transfer forms were provided for inventory (laptops) that were "checked out" during the monitoring review.
- Each campus has a Fixed Asset Inventory Coordinator that acts as the custodian of all equipment housed at their location. The college's Fixed Asset Accountant is ultimately responsible for maintaining asset and inventory records for the entire college.
- Material Services is responsible for the annual college-wide inventory of all federally funded equipment. Any items deemed lost or stolen require a police report and are then reported to the Board of Trustees prior to being reconciled within the inventory management system.
- Monitoring staff conducted inventory reviews across multiple campuses, and no instances of non-compliance were uncovered.
- BC has not reported any instances of theft or loss of property over the course of the past 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 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 attestation
- Policies and procedures for finance and procurement
- Asset and technology plan
- Policies on accessibility
- Inventory and procurement records
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign-in sheets, etc.
- Professional development and training records – agendas, sign-in sheets, training materials, etc.
- CTE student data review
- TABE certifications
- Time and effort reports
- Travel records
- P-card records and reconciliations

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.

- WorkDay® is used as the college's Enterprise Resource Planning (ERP) system and contract management system.
- The Senior Director of Contract Negotiations serves as the college's dedicated contract manager. This position is responsible for the drafting and monitoring of all grant-funded contractual service agreements.
- BC has fiscal, accounting and procurement policies that ensure the efficient management of CTE grant funds. The following policies and procedures were made available to the monitoring staff:
  - Procurement
  - Budgetary
  - Records and reporting
  - Cash management
  - Travel
  - Grant funded purchasing cards
  - Conflict of interest
  - Inventory and property controls
- Purchase orders are only created and authorized for items previously approved in the FDOE federal grant application or via budget amendment(s). Additionally, the Senior Director of Grants, Senior Accountant, Dean of CTE Support Services and the Associate Vice President of Adult and Community Education are ultimately responsible for the approval of all grant expenditures.
- BC administrators have access to grant-funded purchasing cards (P-Card). Policies and procedures for P-Card users were submitted to the monitoring staff as part of the review, along with sample P-Card transactions and reconciliations.

- BC provided additional fiscal records such as time and effort reports, procurement records and travel records. All documents were in accordance with applicable local, state and federal law.

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.

- BC has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students across the college. The list of partners includes, but are not limited to:
  o CareerSource Broward
  o Broward County Public Schools
  o Broward Health
  o Urban League Broward County
  o United Way of Broward County
  o Jack and Jill Broward County
  o PACE Center for Girls
  o City of Lauderhill
  o Broward County Housing Authority
  o Broward UP
  o Broward Partnership for the Homeless
  o Seminole State College

VIII. RESULTS

Broward College was not found to be out of compliance. All items reviewed were compliant in accordance with applicable local, state and federal laws and/or policies and procedures.

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 Broward College monitoring review on behalf of the department. Special thanks is offered to Ms. Christine Honeycutt for her participation and leadership during this process.

Broward College
Career and Technical Education
Risk Matrix

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

Agency Name: **Broward College**
Program Type: **CTE**
Monitoring Year: **2022-2023**

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	**7**	X8	**56**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	**5**	X 8	**40**
	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	**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	**1**	X 4	**4**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
			AGENCY RISK SCORE:		**242**

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

Broward College
Adult Education
Risk Matrix*

*The QAC monitoring team did not conduct an Adult Education risk matrix due to the infancy of the Broward College Adult Education program. No data was available during the creation of the FY2021-22 risk matrix.
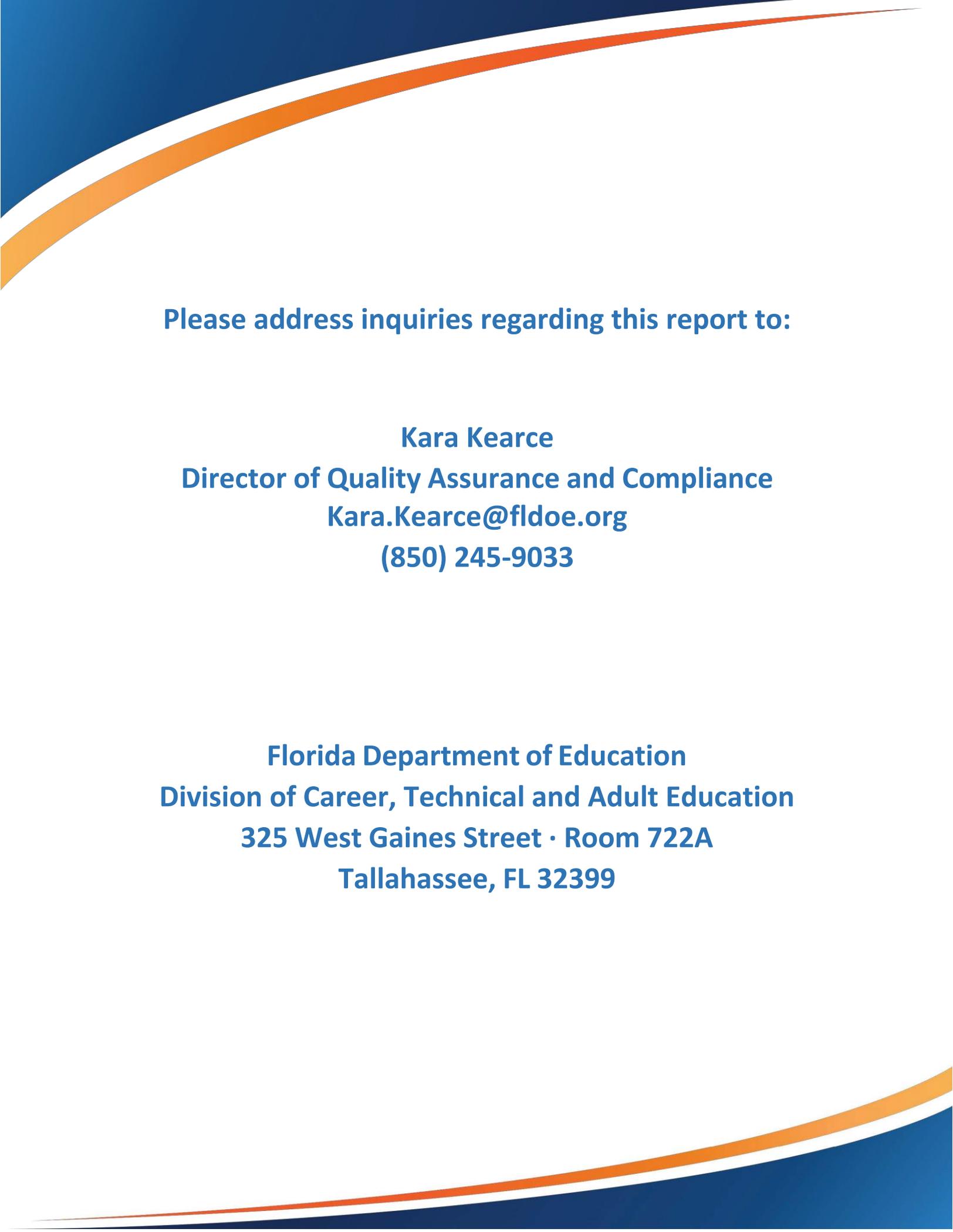
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