**FLORIDA DEPARTMENT OF EDUCATION**

**CAREER AND ADULT EDUCATION**

# Quality Assurance and Compliance
# Onsite Desk Monitoring Review
# for
# Perkins Career and Technical Education
# and
# Adult Education

# Leon County Schools

## November 21-22, 2024

## Final Report

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Florida Department of Education
Division of Career and Adult Education

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## I.  INTRODUCTION

The Division of Career and Adult Education (Division) within the Florida Department of Education (Department) has several key responsibilities, including leadership, resource allocation, technical assistance, monitoring and evaluation. These duties require the Division to oversee the performance and regulatory compliance of federal and state funding recipients. The Quality Assurance and Compliance (QAC) office plays a critical role in this process by designing, developing, implementing and evaluating a comprehensive quality assurance system, which includes monitoring. This system aims to ensure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is the Division's duty to regularly monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

## II.  AUTHORITY

The Department receives federal funding from the U.S. Department of Education for Career and Technical Education under the Carl D. Perkins Strengthening Career and Technical Education (CTE) for the 21st Century Act and for Adult Education (AE) under the Workforce Innovation and Opportunity Act of 2014. The Department awards sub-grants to eligible providers to administer local programs. The Department 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 Code of Federal Regulations 76.770, Education Department General Administrative Regulations and the Uniform Grant Guidance 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 is designed to be utilized by any reviewer who is conducting an onsite or desk monitoring of any program currently administered by the Division. The guide includes a brief overview of each aspect of the monitoring design and the process, as well as objectives that can be used when agencies are monitored or reviewed. You can find the guide on the Division's website at https://www.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 office 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.

Leon County Schools (LCS) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Rocky Hanna, Superintendent, August 16, 2024. The designated representative for the agency was Ms. BJ Van Camp (postsecondary) and Mr. Matt Roberson (secondary).

The Division's representative conducting the OSMR was Program Specialist Chuck Davis of the QAC.

## V. LEON COUNTY SCHOOLS

### Finance
The provider was awarded the following grants for fiscal years (FY) 2021-22, 2022-23 and 2023-24:

**FY 2021-22**

| Grants | Grant Number | Grant Amount | Unexpended |
|---|---|---|---|
| Adult Education - AGE | 370-1912B-2CG01 | $ 264,930.00 | $ 12,350.27 |
| Adult Education - IELCE | 370-1932B-2CE01 | $ 54,629.00 | $ 9,805.92 |
| Adult Education - Corrections | 370-1912B-2CC01 | $ 100,000.00 | $ .00 |
| Perkins Secondary | 370-1612B-2CS01 | $ 474,432.00 | $ 11,446.92 |
| Perkins Postsecondary | 370-1612B-2CP01 | $ 220,261.00 | $ 6,617.66 |

**FY 2022-23**

| Grants | Grant Number | Grant Amount | Unexpended |
|---|---|---|---|
| Adult Education - AGE | 310-1913C-3CG01 | $ 242,430.00 | $ 837.69 |
| Adult Education - IELCE | 370-1933B-3CE01 | $ 139,129.00 | $ 2,398.83 |
| Adult Education - Corrections | 370-1913B-3CC01 | $ 100,000.00 | $ 45,187.91 |
| Perkins Secondary | 370-1613B-3CS01 | $ 489,682.00 | $ 57,828.63 |
| Perkins Postsecondary | 370-1613B-3CP01 | $ 279,297.00 | $ 6,507.73 |
| Perkins Equipment Upgrade and Modernization | 370-1613R-3C001 | $ 81,894.00 | $ .00 |

**FY 2023-24**

| Grants | Grant Number | Grant Amount | Unexpended |
|---|---|---|---|
| Adult Education - AGE | 370-1914C-4CG01 | $ 263,529.00 | $ 4,073.86 |
| Adult Education - IELCE | 370-1934B-4CE01 | $ 31,597.00 | $ 104.36 |
| Adult Education - Corrections | 370-1914C-4CC01 | $ 88,540.00 | $ 9,612.61 |
| Perkins Secondary | 370-1614S-4CS01 | $ 407,496.00 | $ 55,015.48 |
| Perkins Postsecondary | 370-1614P-4CP01 | $ 263,458.00 | $ 8,828.55 |

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

## 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
The monitoring team visited the following sites as part of the OSMR:

- LCS – Lincoln High School
- LCS – Raa Middle School
- Leon County Technical College – Lively Technical College (LTC)

Entrance and Exit Conferences
The entrance conference for LCS was conducted on November 21, 2024. The exit conference was conducted on November 22, 2024. The participants are listed below:

| Name | Title | Entrance Conference | Exit Conference |
|---|---|---|---|
| BJ Van Camp | Director- Lively Technical College | X | X |
| Matt Roberson | Director- LCS | X | X |
| Rod Duckworth | Assistant Director- Lively Technical College | X | X |
| Regina Browning | Director- Adult & Community Education School (ACE) | X | X |
| Matt Zadra | Assistant Director- Lively Technical College | X | X |
| Henry Koger | Coordinator- Lively Technical College | X | X |
| **Division Monitoring Team** | | | |
| Chuck Davis | Program Specialist, QAC | X | X |
| Michael Swift | Program Specialist, QAC | X | X |

Interviews
No interviews were required as part of the OSMR. LCS submitted thorough and qualitative documentation and records via the Department ShareFile.

Records Review
Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, part F. A minimum of 50 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 LCS CTE and AE grants are managed by experienced program administrators and follow the same process for the drafting, approval and submissions of their grants to FDOE.
- The Division grant manager for LCS reported that grant applications and amendments are routinely submitted on time and typically require little to no additional guidance. If revisions are needed, the program directors submit those in a prompt manner.
- As part of the required comprehensive local needs assessment (CLNA), LCS CTE administrators consulted with numerous individuals and entities across their service area. Representatives from stakeholder groups also provided insight into the workforce needs and opportunities for special student population students. The list of stakeholders includes, but is not limited to:
  - CareerSource Capital Region – Representatives of local workforce board
  - LCS administrators and faculty – Local secondary educational agency representatives
  - LCS Counselor and Disabilities Specialist – Special populations and individuals with disabilities
  - Multiple civic engagement organizations – Out-of-school youth, homeless children and youth at-risk
  - Local business owners (private and public)
  - Parents and students

- Workforce Advisory meetings are held throughout the school year with the above-mentioned stakeholders, as well as other participants who represent multiple entities within the county.
- While conducting their Labor Market Analysis (LMA), LCS also received multiple letters of support from their local CareerSource and other public entities that spoke of the need for some programs represented in their CLNA. These letters of support represent programs that aren't included on the local and/or state occupation demands report.
- LCS conducts ongoing professional learning and training events 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. Department-sponsored training events are also attended. LCS provided multiple records of district-wide training and learning events.

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 on.

- LCS currently utilizes FOCUS® as their management information system (MIS) and student information system to house and track AE and CTE student data such as records, grades and attendance.
- The district has policies and procedures on data collection, entry and verification. Administrators who have access to the MIS include assistant principals, program coordinators, project managers, the registrar and the Instructional Information System Specialist. Ongoing training is provided for all individuals who have access to student data and FOCUS®. Job descriptions were provided as part of the monitoring review.
- LCS provided district guidelines on instructional hours, pre and post-testing of students, and how to interpret scores and assign educational functioning levels (EFL). It is a student's assigned functioning level that determines placement within Adult Basic Education (ABE) and Integrated English Literacy and Civics Education (IELCE) programs.
- All proctors of the Tests for Adult Basic Education (TABE) and the Comprehensive Adult Student Assessment System (CASAS) are trained and certified, as required, by the state and the appropriate testing companies. LTC and Adult & Community Education (ACE) are also certified Pearson VUE® testing sites.

- All of the data elements required of their local MIS were included in the system and verified during the monitoring review.
- Student electronic files include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
- Samples of CTE and AE student data were reviewed and verified for accuracy as part of the OSMR. No errors were found. All student records were provided by LCS.

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

- LCS offers CTE and AE programs at LTC, ACE, the Leon County Detention Center, CS Capital Region and multiple high schools throughout Leon County.
- ACE-U is a program that offers students Integrated Education and Training (IET) programs to introduce AE learners to workforce training opportunities in addition to their IELCE or ABE curriculum. ACE partners with local education agencies (LEA), Tallahassee State College and LTC to offer introductions into healthcare fields, entrepreneurship and transportation. Students who participate in ACE-U have the unique opportunity to hone workforce skills, earn a high school diploma and finish the program with a career certification. Although temporarily halted due to the pandemic, corrections students also have the opportunity to participate in the entrepreneurship component of IET.
- AE administrators participate in ongoing IET state-sponsored committee meetings and training events.
- LCS offers CTE students multiple opportunities to participate in additional learning activities outside of the classroom.
  - Apprenticeship programs in Heating, Ventilation, Air-Conditioning (HVAC), Automotive Service Technology and Information Technology.
  - Externships in HVAC and Healthcare Sciences.
  - Work-based learning and on-the-job training (OJT) is a priority within the district.
  - Students participate in Career and Technical Student Organizations (CTSOs).
- LCS and LTC have numerous agreements with local healthcare providers so Health Science students can participate in required clinical experiences.
- High performing students within the Secondary CTE programs are eligible to participate in Career Dual Enrollment. This allows students to earn Postsecondary credits toward industry certifications while still in high school. Articulation Agreements are currently in place with LCS, Florida State University School (FSUS) and Wakulla County School Board (WCSB).
- A memorandum of understanding (MOU) is in place with CS Capital Region to provide numerous resources and trainings, in conjunction with LTC, for those interested in Workforce programs or adult literacy services.
- AE and CTE instructors participate in ongoing trainings provided by FDOE, as well as annual professional learning through the district. Instructors also participate in program-specific training and certifications programs.
- No reasonable services and accommodations are denied to those students who self-declared a disability. The district Exceptional Student Education office is responsible for ensuring equal access and opportunity to education programs, services and/or activities for all students. An individualized educational plan (IEP) is developed for each student with a disability who needs specially designed instruction and related services. Each student has an IEP team that works with them and their parents.

   o The Success for Occupational Area Readiness (SOAR) program was specifically designed to partner with LTC, CS Capital Region and LCS to provide Postsecondary CTE career certificate programs for students with intellectual disabilities.

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 district has policies and procedures on property management, equipment safety/storage, inventory reconciliation and inventory disposal.
- The district conducts inventory once per fiscal year of all capital assets with a value of $1,000.00 or more. Each school and/or program site is given a property record report that outlines all tangible personal property to be located during said inventory. Any piece of equipment found out of place is investigated to determine if the item should be relocated to the location notated on the property record report or updated within the property records to match the new location.
- Items considered "unable to locate" (UTL) are reported on the Inventory Discrepancy Form, which triggers an investigation into the whereabouts of the equipment. Depending on the outcome of this investigation: (a) a Plant Security Report will be completed and an incident report will be filed with local law enforcement if the item was determined to have been stolen; (b) the site principal will complete an Inventory Certification form to confirm the accuracy of the findings; and (c) all items reported as UTL will be removed from the site's property records and reported to the Chief Financial Officer (CFO) and School Board for final write-off.
- LCS has policies and procedures that must be followed any time a piece of capital equipment is removed from its original location. A Transfer of Property form must be used when an item is being permanently removed from one site to another, and a Temporary Removal of Property form must be used in the event that an item is ever "assigned" to a student or teacher for use away from the site.
- The Property Management Department is responsible for ensuring all capital assets are "tagged" upon arrival to the district, but the site administrator at each school ultimately becomes the custodian of all equipment at his/her school.
- As part of the OSMR the QAC team conducted inventory searches at three locations across the district.

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

- LCS included the necessary policies required by the General Education Provisions Act (GEPA) and other federal laws, which ensure equal access and participation in programs regardless of sex, race, national origin, color, disability or age.

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.

**Documents reviewed are:**
- Notification of social security number collection, usage and release

- Student authorization for access to educational records
- FERPA notification
- ESE manual
- Testing policies and procedures manual
- Time and effort reports
- Student data
- AE student attendance records reflecting class drops
- Fiscal and operational policies and procedures
- CASAS certifications
- Multiple MOUs
- Dual enrollment articulation agreement
- Advisory committee meeting records
- Travel records
- GEPA statement
- Disability Services Manual
- CLNA documentation
- Professional learning calendar

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.

- Skyward® Business PLUS is used as the district's enterprise resource planning (ERP) and financial management system. The ERP is also used as the district contract management system, although LCS does not currently have any open contracts using AE or CTE federal grant funds.
- The district's Board Policy Manual ensures the efficient management of CTE and AE grant funds. The following components of the manual were reviewed:
  o Property control
  o Accounting practices
  o District budget policies
  o Methods of procurement
  o Contract Management
  o Conflict of interest
  o Cash Management
- The district purchasing department works with the AE and CTE grant managers to ensure all expenditures are allowable by law and able to be funded with federal dollars. It is the responsibility of the purchasing department to utilize the most efficient and effective purchasing method when expending federal grant funds. This department also works directly with schools on writing specifications for Invitations to Bid (ITB), Request for Proposals (RFP) and Invitations to Quote (ITQ) for the purchase of capital assets and services.
- Once programmatic needs are determined and written into the grant application, it is up to the program director, coordinator and site principal to give final approval on all grant-funded expenditures. Purchase orders are only created and authorized for items previously approved in the FDOE federal grant application.
- When an electronic purchase request is initiated within Skyward®, the method of procurement is determined based on the purchase price of the item(s). The LCS Purchasing

Department Policy and Procedure Manual mandates the following approval process when expending grant funds:

- o Goods and services valued under $8,000.00 do not require any sort of competitive solicitation and may be purchased on the open market using practical and responsible judgment.
- o Purchases between $8,000.01 and $50,000.00 require a minimum of three quotes if not previously covered by an existing competitive solicitation.
- o Any purchase over $50,000 requires a competitive solicitation utilizing a formal bid process.
- o Policies and procedures exist for sole source purchases and require Board approval for any item costing more than $50,000.

- LCS makes an effort to retain quotes from small businesses and minority and women-owned businesses.
- Program directors, coordinators and school financial accountants 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.

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.

- LCS has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within the district. The list of partners include, but is not limited to:
- o CareerSource Capital Region
- o Wakulla County Schools
- o Tallahassee Memorial Hospital
- o Eden Springs Nursing and Rehabilitation Centre
- o Centre Pointe Health and Rehabilitation Center
- o Bond Health Clinic
- o Tallahassee State College

## VIII.   RESULTS

LCS was found to be out of compliance due to the following:

| Finding Number | 1 |
|---|---|
| Area | Finance |
| Finding Summary | A grant budget analysis (GBA) was conducted for LCS for all grants from 2021-2024. There were errors in: Object codes were overspent with no budget amendments submitted. |
| Finding Detail | <ul><li>FY 2021-22</li><li>CTE-Secondary, Postsecondary, AE:</li></ul> Object codes were overspent with no budget amendments submitted. |
| Citation | Violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments. Along with 2 CFR |

| | |
|---|---|
| | 200.308, (b) (c) Revisions of the budget & program plan, and 2 CFR 200.407, not seeking prior approval before expending funds. |
| **Recommended/Anticipated Corrective Action** | The director will provide a letter of attestation and plan of corrective action |
| **Anticipated completion date:** | 2/6/2025 |
| **Name and Title responsible for CAP** | BJ Van Camp, Director CTE & AE, Lively Vo Tech |
| **Plan Accepted by:** | Chuck Davis |
| **Status of Action Plan** | Complete |

## IX.    SUMMARY

After completing the monitoring review and receiving any additional information requested, a preliminary report is sent to the provider for their review. The Division monitoring team lead may consider comments at their discretion. Once the final report is approved, it will be sent to the agency head and a copy will be sent to the provider's designated contact person. The final report will also be posted on the Department's website, which you can find at:
http://fldoe.org/academics/career-adult-edu/compliance

Once all outstanding corrective action plan items have been completed (when applicable), the Division will issue a closure letter to the agency head and designated contact person. This letter will signify the end of the monitoring process and that no further action is required.

On behalf of the Division, the monitoring team would like to extend their appreciation to all participants in the Leon County Schools monitoring review.. A special thanks is offered to Ms. BJ Van Camp and Mr. Matt Roberson for their participation and leadership during this process.

Leon County Schools
Career and Technical Education
Risk Matrix

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

Agency Name: **Leon County Schools**
Program Type: **CTE**
Monitoring Year: **2023-2024**

| 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 | 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 | 7 | X 4 | 28 |
| | Upper Middle | 5 | | | |
| | Lower Middle | 3 | | | |
| | Lower Quartile | 1 | | | |
| | 0 | 0 | | | |
| | | | **AGENCY RISK SCORE:** | | **224** |

Data sources used for calculations: Prior to July 1, 2023

Leon County Schools
Adult Education
Risk Matrix

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

Agency Name: **Leon County Schools**
Program Type: **AE**
Monitoring Year: **2023-2024**

| 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 | 5 | X 8 | 40 |
| | 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 | 3 | X 4 | 12 |
| | Upper Middle | 5 | | | |
| | Lower Middle | 3 | | | |
| | Lower Quartile | 1 | | | |
| | 0 | 0 | | | |
| **Number of Findings from the Office of the Auditor General** | Upper Quartile | 7 | 7 | X 4 | 28 |
| | 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** | **210** |

Data sources used for calculations: Prior to July 1, 2023
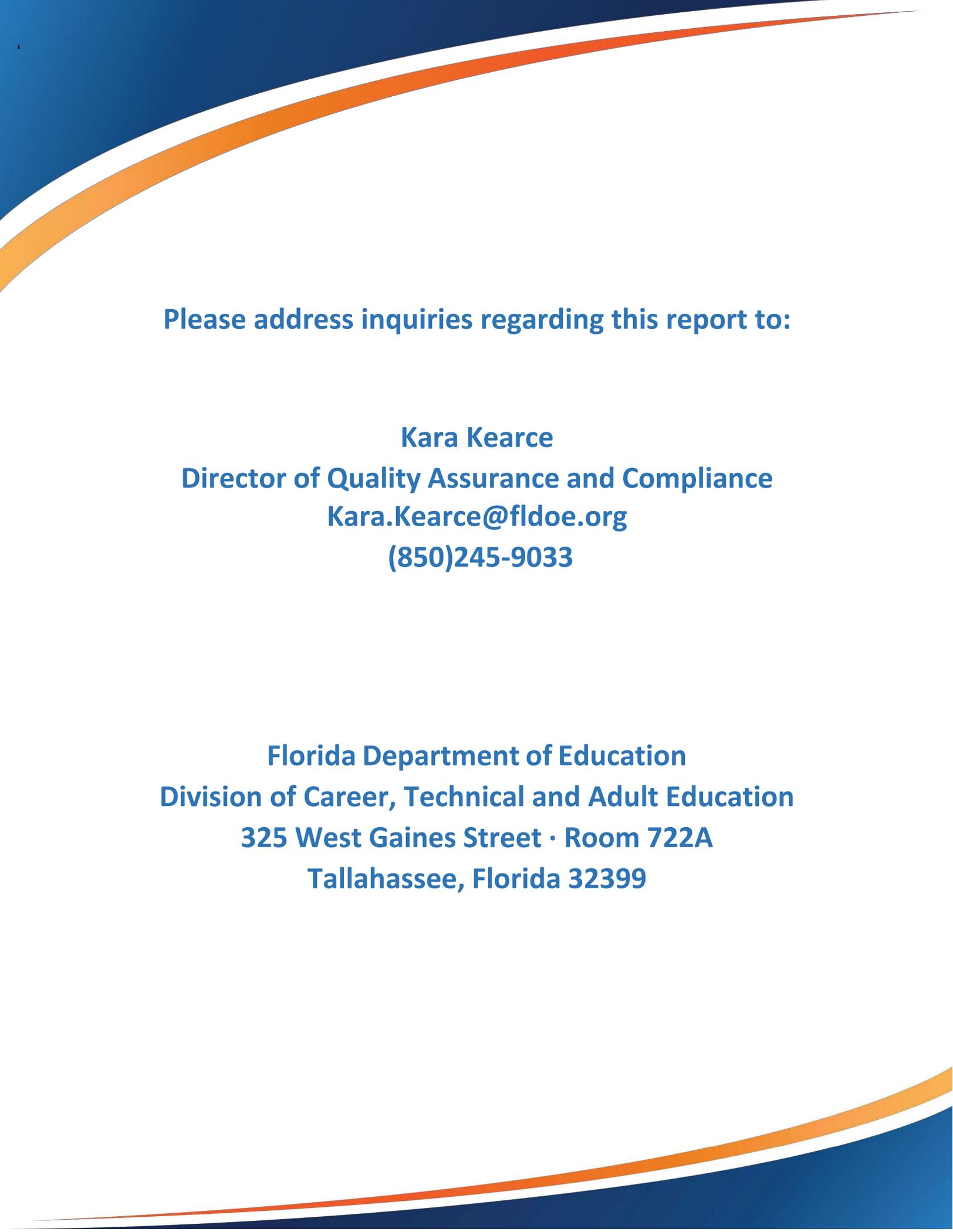
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