FLORIDA DEPARTMENT OF EDUCATION
CAREER AND ADULT EDUCATION

Quality Assurance and Compliance

Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant

St. Petersburg College

September 2024

Final Report

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Florida Department of Education
Division of Career and Adult Education

St. Petersburg College
Pathways to Career Opportunities Grant (PCOG)
Quality Assurance and Compliance Monitoring Report

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

Pursuant to Section 1008.32, Florida Statutes, Rule 6A-20.046, Florida Administrative Code, the PCOG Request for Proposal and the Uniform Grant Guidance, also referred to as 2 Code of Federal Regulations Part 200**,** the Department is responsible for monitoring programs run by a sub-grantee or provider of supported activities to ensure adherence to relevant federal and state regulations.

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. The guide can be found on the Division's website at http://fldoe.org/academics/career-adult-edu/compliance.

IV. PROVIDER SELECTION

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.

The St. Petersburg College (SPC) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Tonjua Williams, President, on August 16, 2024. The designated representative for the agency was Ms. Marie Couch, Project Director, Workforce Education.

The Division's representative conducting the VDMR was Program Specialist Michael Swift of the QAC.

V. ST. PETERSBURG COLLEGE

Finance
The provider was awarded the following grant for the fiscal years 2019-21:

FY 2019-21

Grant	Grant Number	Grant Amount	Unexpended
Pathways to Career Opportunities	522-90310-0D002	$ 199,739.00	$ 0.00

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

VI. MONITORING ACTIVITIES

The monitoring activities include pre- and post-review planning, an entrance and exit conference, inventory (if necessary), records review and interviews with administrators (if necessary).

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

- SPC – Midtown Campus
- SPC – Clearwater Campus

Entrance and Exit Conferences
The entrance conference for SPC was conducted on September 30, 2024. The exit conference was conducted on October 3, 2024. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Marie Couch	Project Director, Workforce Development, SPC	X	X
Kritina Renaud	Grants Manager, SPC	X	
Jackie Skryd	Vice President, Workforce Development, SPC	X	X
Julia Meyer	Certification Testing Coordinator, SPC	X	
Karen Reynolds	Director of Procurement, SPC	X	
Raynier Mohammed	Senior Information Technology Analyst, SPC	X	
Liz Mott	Senior Administrative Services Specialist, SPC	X	
Kimberly Qualls	Senior Administrative Services Specialist, SPC	X	X
Vicky Thomann	Grants Accountant, SPC	X	X
Vonda Woods	Director of Accounting, SPC	X	X
Mike Meigs	Associate Vice President of Accounting, SPC	X	
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	X	X
Chuck Davis	Program Specialist, QAC	X	X

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

Records Review
Program, financial, administrative and student records were reviewed, if required. A complete list is provided in section VII, part 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.

- SPC only received PCOG funding for the 2019-20 fiscal year. A no cost extension was granted, thus extending the project through the 2021 fiscal year.
- The SPC PCOG grants are managed by a knowledgeable project director with numerous years of experience within her respective program areas. The project director works directly with administrators and faculty to determine the needs of each program area and to determine if those needs will fit within the scope of their state award(s).
- SPC's experience with apprenticeship programs date back to 2015 when the United States Department of Labor awarded a $5 million dollar grant to a consortium of colleges, including Florida State College at Jacksonville, Broward College and SPC for the purpose of expanding apprentice programs throughout the state. In 2019, SPC became a sponsor for the Community Health Worker (FCHW) apprentice program and added two of their own programs.
- Deliverables were submitted to the Division on time, needing limited technical assistance. All deliverables were paid at or near full value.

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 on.

- Although no student enrollment data was requested of the Division's Data, Research and Evaluation team, SPC does have policies and procedures that outline the necessary steps to ensure that all student data reported by the college is valid, reliable and aligned with reporting requirements. Multiple checks and balances are in place to ensure the accuracy of data reported to the Department.
- SPC utilizes PeopleSoft Student® as its integrated Management Information System (MIS) and student information system. The MIS meets all Department requirements as defined by the Data Dictionary.
- Upon review of enrollment records, SPC reported no pre-apprentices were registered for the program. Please see the "Results" section of this report for further detail.

C. **CURRICULUM AND INSTRUCTION** refers to elements contributing to student learning and skill acquisition.

- For the 2019-21 (no cost extension) project years SPC was awarded state PCOG funds to support the implementation of a new Clinical Medical Assistant pre-apprenticeship program. Because a CMA certification is required for entry into the FCHW program, the decision was made to offer a pre-apprentice program to filter into the apprenticeship program.
- No further curriculum or instruction details were notated, as the provider did not report any registered students for the program.

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

- All inventory criteria set forth by federal, state and local guidelines are included within the college's fixed asset management system.
- SPC has policies and procedures to establish actions for purchasing, tracking and managing equipment acquired with federal grant funds in compliance with federal regulations and institutional policies. Policies include property management, equipment safety/storage, inventory reconciliation and inventory disposal. In addition to these policies and procedures, SPC has internal controls and procedures to govern loss prevention, transfer of property and the surplus of capital equipment.
- The Materials Management Specialist is ultimately responsible for the college's capital assets. Additional job functions include coordinating the movement, stocking, purchasing, delivery and disposal of equipment.
- All capitalized equipment and inventory over $5,000 is tracked via the college's inventory management system. Policies for inventory management of non-capitalized equipment is also adhered to.
- Monitoring staff conducted PCOG inventory reviews at the Midtown and Clearwater campuses and all inventory was accounted for and in its correct location. QAC staff verified all inventory at the $5,000 threshold, as well as spot checked $1,000 items for internal controls compliance. No issues were uncovered.
- Capitalized equipment is inventoried at least annually, and all inventoried property must match the records maintained within the inventory management system.
- SPC reported no instances of theft or loss of inventory for the years monitored.

E. **RECORDS REVIEW** refers to reviewing the records and documents supporting compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.

Documents reviewed were:

- Policies and procedures for financial accounting
- Policies and procedures for inventory management
- Pre-apprenticeship employer agreement form
- Final Project Disbursement Report
- Grant Budget Analysis (GBA)
- Grant transaction ledger
- PCOG performance outcome forms
- Pre-apprenticeship activity reports
- Quarterly deliverables

F. **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.

- SPC uses Peoplesoft® as its dedicated financial management system. Purchasing, contracts, deliverables and all fiscal aspects of their grants are housed within the system.
- SPC uses the Florida College System accounting manual as a uniform and systematic guide for all accounting and fiscal measures of their federal grant award. The college also has a Grant Accounting Handbook for uniform guidance on federal grants.

- The following components of the policies and procedures manual were reviewed as part of the monitoring process:
  - Purchasing guidelines and procedures
  - Sole source and single source purchases
  - Budget implementation
  - Cash management
  - Contracts and bids
  - Purchasing cards (P-card)
  - Inventory management
  - Procurement
  - Conflict of interests
  - Ethics
  - Travel

  All procedural documents were provided by SPC.
- SPC does use grant-funded P-cards for minor purchases up to $2,000. All purchases made with P-cards must receive prior approval and be used solely for the operation of a grant-funded program. When a P-card is used, it is the responsibility of the authorized card holder to submit proper documentation to the finance department for reconciliation toward the appropriate grant fund.
- No purchases shall be authorized without prior approval from the Division via a grant award letter and/or subsequent amendment(s).
- Once a service or equipment need is determined, the department head will create a purchase requisition for review by the Purchasing Department. Once approved, a purchase order is prepared, processed and sent to the vendor. When equipment is received or a service is completed, the accounts payable department will then process payment to the vendor and/or contractor.
- All supplies, equipment and services charged to a grant-funded source shall be purchased using sound judgement and obtained at the lowest cost possible. Expenditures must go toward the operation of programs and fit within the scope of the grant. Unless exempt from competition, the per unit dollar value of a purchase dictates the procurement method used to acquire goods and/or services.
  - Less than $5,000 – Requires one or more written or verbal quotations be solicited.
  - $5,000 but less than $65,000 – Requires three written quotations be solicited.
  - Over $65,000 – Competitive solicitations will be managed by the purchasing department.

  Policies on sole source and single source purchases are also included in the college purchasing manual.
- The monitoring team lead conducted a GBA to compare SPC's approved budget and amendments versus their final expenditure reports that are submitted to the Department Comptroller's office. All records were aligned with their approved PCOG award.

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

- SPC has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within their service area. The list of partners includes, but is not limited to:
  - CareerSource Pinellas
  - Community Health Centers of Pinellas
  - The Workforce Institute

VIII. RESULTS

The following concern was raised as part of the SPC PCOG monitoring review:

Concern	**1**
Area	Program enrollment
Concern Summary	The Clinical Medical Assistant program did not report any registered pre-apprentice students for the years monitored.
Concern Detail	The provider is out of compliance due to the lack of registered enrollees and no active partnering with a Registered Apprentice program sponsor. Although SPC did have an apprentice program registered by the Department, there has been no report of activity as of July 29, 2026.
Potential Impact	Lack of training and responsiveness on behalf of the sponsor for both programs could adversely affect future funding.

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 can be found at https://www.fldoe.org/academics/career-adult-edu/.

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 SPC monitoring review. A special thanks is offered to Ms. Marie Couch for her participation and leadership during this process.

Please address inquiries regarding this report to:

Kara Kearce
Director of Quality Assurance and Compliance
Kara.Kearce@fldoe.org
(850) 245-9033

Florida Department of Education
Division of Career, Technical and Adult Education
325 West Gaines Street · Room 722A
Tallahassee, Florida 32399