



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

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

Gadsden County School District

March 24, 2025

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Gadsden County School District
Perkins Career and Technical Education
and
Adult Education
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

The Department receives federal funding from the U.S. Department of Education's Office of 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. The guide 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 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 Gadsden County School District (GCSD) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Elijah Key, Superintendent, on December 12, 2024. The designated representative for the agency was Mr. Willie Jackson.

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

V. Gadsden County School District

Finance

The provider was awarded the following grants for the fiscal years (FY) 2021-22 to 2023-24:

FY 2021-22

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	200-1612B-2CS01	\$ 121,008.00	\$ 8,262.11
Perkins Rural Innovation	200-1612B-2CR01	\$ 35,509.00	\$.00

FY 2022-23

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Perkins Secondary	200-1613B-3CS01	\$ 125,652.00	\$ 31,972.67
Perkins Rural Innovation	200-1612B-3CR01	\$ 72,408.00	\$ 5,295.67

FY 2023-24

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult Education – General	200-1914C-4CG01	\$ 122,864.00	\$ 114,094.82
Adult Education – Integrated English Literacy and Civics Education (IELCE)	200-1914C-4CE01	\$ 4,826.00	\$.00
Perkins Secondary	200-1614S-4CS01	\$ 137,535.00	\$ 36,121.26
Perkins Rural Innovation	200-1914R-4CR01	\$ 74,453.00	\$ 11,658.00

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

VI. MONITORING ACTIVITIES

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

Onsite Visits

An onsite meeting and review took place at the following location:

- Gadsden Technical College – Quincy, Florida

Entrance and Exit Conferences

The entrance conference for GCSD was conducted on March 24, 2025. The exit conference was conducted on March 24, 2025. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Willie A. Jackson	Director, Gadsden Technical College	X	X
Angela G. Sapp	CTE Coordinator, Gadsden Technical College	X	X
Stephanie B. Moore	Assistant Director, Adult Education, Gadsden Technical College	X	X
Doris Drake	Nursing Coordinator, Gadsden Technical College	X	X
Jacary Byrd	Office Manager, Gadsden Technical College	X	X
Anita Edwards	Chief Operating Officer (COO), LANEFL	X	X
Division Monitoring Team			
Charles Davis	Program Specialist, QAC	X	X
Dantavia Davis	Program Specialist, QAC	X	X

Interviews

No interviews were required as part of the OSMR. GCSD 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. 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.

- GCSD has policies and procedures for the writing and completion of grant applications prior to being submitted to the Department. The CTE director works with her program coordinators and advisory committees to determine what program needs will be addressed within her grant

application. The grant application is then approved by the CTE director, district finance department and the district superintendent before it is submitted to the Department.

- The comprehensive local needs assessment (CLNA) included in the GCSD Perkins grants required consultation with numerous community stakeholders. Consultations included: students and teachers; Chipley, Marion and Taylor counties; Gadsden Technical College; and local business and community leaders.
- GCSD attends Department sponsored trainings to stay abreast of federal and state requirements as it pertains to CTE. Local training is also offered to administrators and teachers.

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.

- GCSD utilizes the Focus® system as their integrated management information system (MIS).
- GCSD CTE staff and program administrators participate in Department sponsored trainings such as: spring and fall Workforce Education and District Data Advisory Council (WEDDAC) meetings; Florida Association of Career and Technical Education (FACTE) and Division of Career and Adult Education (DCAE) presentations; the annual Adult and Community Education (ACE) conference; and other specialized training offered by DCAE.
- District registration forms include student “release of information” clauses as required by the Family Educational Rights and Privacy Act (FERPA).
- GCSD has a multi-tiered data review process that takes place prior to student records being submitted to the Department. CTE instructors are required to complete a Final Class Report which is reviewed by school data entry clerks, the district director and MIS staff. Once this data is submitted into the MIS there is an additional error report that is run prior to submission to the Department.
- 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 GCSD.

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

- The district’s CLNA uncovered opportunities to build upon their current Perkins programs. GCSD involves multiple stakeholders in the continued assessment of the local workforce’s needs. Future program offerings are adjusted based on those needs.
- Students are offered the opportunity to participate in Culinary Arts and Administrative Office Specialist programs as early as middle school. These students learn program basics and have a good foundation of knowledge that allows them to transition into programs at the high school level.
- GCSD offers students multiple opportunities to participate in additional CTE learning activities outside of the classroom. District students are involved in CTE clubs and Career and Technical Student Organizations (CTSOs). Programs such as barbering and cosmetology afford students the opportunity to put classroom practice into real world action. Students work, under the supervision of instructors, with citizens in the community to provide discounted haircuts and cosmetic services. Qualified high school CTE students are also able to dual enroll at Gadsden Technical College.

- No reasonable services and accommodation are denied to those students with disabilities. The district works with all students with disabilities to ensure their individual needs are being met.
- CTE guidance counselors receive the same training as CTE administrative staff and teachers. This ensures a consistent flow of information between students, counselors and teachers.

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

- GCSD 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.

E. 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.

- The district's threshold for capitalization is \$5,000.
- GCDS has a policy and procedure regarding new equipment requests, equipment safety/storage and disposal of old inventory.
- Technology and equipment is up to date and is being used specifically for CTE programs. The technology is integrated into the curriculum as required per program.
- Equipment is inventoried annually and capital items over \$1,000 receive a numbered inventory identification tag. The system tracks the required elements set forth by the Department and the Uniform Grant Guidance.
- There have been no reports of stolen or lost equipment over the previous three fiscal years.

F. 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:

- Size, scope and quality review
- CLNA
- District policies and procedures for finance and procurement
- District technology plan
- Student and employee handbooks
- Inventory records
- Procurement records
- Memorandums of Understanding (MOUs) and articulation agreements
- Advisory committee records – agendas, sign in sheets, etc.
- CTE and AE 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.

- Skyward® is used as the district's Enterprise Resource Planning (ERP) system.

- The CTE director works with the budget and finance director to determine what expenses will be funded via their Perkins grant. Once these items are approved in their grant application, all expenditures run through an automated approval process within Skyward®. The district superintendent is the last line of approval prior to funds being released for a purchase.
- Monthly budget reports are shared among the CTE director and the finance director. These reports and meetings ensure that grant expenditures are being managed properly. Budget amendments are submitted to the Division if the need arises.
- GCSD has policies and procedures that provide uniform guidance on the fiscal management of their federally funded grant(s). All documentation and records reviewed were in accordance with applicable federal and state laws; Department rules; and administrative rules directly pertaining to each grant. The following components of the procedures manual was reviewed as part of the monitoring process:
 - Internal controls
 - Purchasing guidelines and procedures
 - Budget implementation
 - Cash management
 - Contracts and bids
 - Inventory management
 - Procurement
 - Conflict of interests
 - Ethics
 - Travel
- GCSD provided additional fiscal records such as:
 - Purchase invoices
 - Time and effort reports
 - Financial statements
 - Travel records
- Monitoring staff conducted a budget analysis of GCSD's Department grants. Upon review, the following non-compliance finding was discovered:
The district submitted multiple DOE399/499 final expenditure reports past the deadline outlined in the Request for Application (RFA). See Finding 1

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.

- GCSD has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners includes, but are not limited to:
 - CareerSource Capital Region
 - Gadsden Center for Health Education
 - HealthSouth Rehabilitation Hospital of Tallahassee
 - Gadsden County Development Council
 - Big Bend Technical College
 - Tallahassee State College

VIII. RESULTS

GCDS 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 GCSD for all grants from 2021-2024. Final expenditures were not reported by the date specified in the RFA/RFP.
Citation	Violation of the Project Application Procedures for Federal and State Programs (Green Book), & requirements of RFA/RFP.
Recommended/Anticipated Corrective Action	The Superintendent will provide a letter of attestation stating there will be a plan in place that will assure that submission of reports will be done in a timely manner and that future late or inaccurate submissions may result in delayed award letters for the next cycle.
Anticipated completion date:	4/9/2025
Name and Title responsible for CAP	Elijah Key, Superintendent, GCPS
Plan Accepted by:	Chuck Davis 4/7/2025
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 is located at:

<https://www.fl DOE.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 GCSD monitoring review. A special thanks is offered to Mr. Willie Jackson for his participation during this process.

APPENDIX A

Gadsden County School District
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants					
Agency Name: Gadsden County School District					
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	<u>X 10</u>	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	3	<u>X8</u>	24
	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	7	<u>X 6</u>	42
	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	5	<u>X 4</u>	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	<u>X 4</u>	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					210

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



Please address inquiries regarding this report to:

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