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

St. Johns River State College

February 24-25, 2025

Final Report

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Perkins Career and Technical Education
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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 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. The guide can be found 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.

The St. Johns River State College (SJRSC) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Joe H. Pickens, President, December 12, 2024. The designated representative for the agency was Dr. Ellen Burns.

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

V.   ST. JOHNS RIVER STATE COLLEGE

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	542-1912B-2CG01	$ 240,406.00	$ 65,577.87
Perkins Rural	542-1612B-2CR01	$ 40,908.00	$ 535.51
Perkins Postsecondary	542-1612B-2CP01	$ 345,284.00	$ 14,609.46

FY 2022-23

Grants	Grant Number	Grant Amount	Unexpended
Adult Education - AGE	542-1913C-3CG01	$ 304,406.00	$ 120,588.41
Perkins Rural	542-1613R-3CR01	$ 40,417.00	$ 17.42
Perkins Postsecondary	542-1613B-3CP01	$ 300,685.00	$ 2,465.65

FY 2023-24

Grants	Grant Number	Grant Amount	Unexpended
Adult Education - AGE	542-1914C-4CG01	$ 207,434.00	$ 43,189.23
Perkins Rural	542-1614R-4CR01	$ 40,659.00	$ 396.81
Perkins Postsecondary	542-1614P-4CP01	$ 282,618.00	$ 8,312.77

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

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

- Orange Park Campus
- St. Augustine Campus

Entrance and Exit Conferences

The entrance conference for SJRSC was conducted on February 24, 2025. The exit conference was conducted on February 25, 2025. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Dr. Ellen Burns	Associate Vice President for Assessment, Research & Grants, SJRSC	X	X
John Peterson	Assistant Vice President for Workforce & Career Services, SJRSC	X	
Edward Jordan	Vice President for Academic & Student Affairs, SJRSC	X	X
Anastacia Hohrath	Director of Institutional Effectiveness, SJRSC	X	
Angeline Cloud	Instructional Project Manager, SJRSC		X
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	X	X
Dantavia Davis	Program Specialist, QAC	X	X
Chuck Davis	Program Specialist, QAC	X	X

Interviews

No interviews were required as part of the OSMR. SJRSC 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 SJRSC CTE and AE grants are managed by program administrators and follow the same process for the drafting, approval and submissions of their grants to FDOE.
- The SJRSC Grants Guide serves as a resource for grants project directors, staff and administrators to understand grant development and management processes, policies and practices and to meet their obligations to the College and the funding agency. The guide includes grant-specific guidelines and processes as well as links to applicable college, state and federal policies, regulations and requirements. The guide serves as a starting point for development and management of externally funded projects. It is provided to minimize difficulties and increase success in award acquisition and management. The guide is not

intended to be comprehensive, nor is it a substitute for college, state and federal Policies or the terms of the grant award.

- The grant manager for SJRSC reported that grant applications and amendments are routinely submitted on time and require little to no additional guidance. If revisions are needed, the program directors submit those in a prompt manner. Also, the grant manager requested that the monitoring team review purchases for technology services. SJRSC provided complying documentation.
- All projected Perkins purchases are aligned with an eligible program through the budget and actively tracked by the program.
- As part of the required comprehensive local needs assessment (CLNA), SJRSC 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 populations, as permitted by state and federal law. The list of stakeholders includes, but is not limited to:
  o CareerSource Northeast Florida – Representatives of local workforce board
  o JAXUSA
  o SJRSC administrators and faculty – Local educational agency representatives
  o SJRSC Counselor and Disabilities Specialist – Special populations and individuals with disabilities
  o Local business owners (private and public)
  o Parents and students
- Perkins postsecondary grants continue to support College Central Network to promote career exploration and job advancement.
- State Workforce Outreach & Student Success Coordinators routinely connect with secondary guidance counselors from the districts to share program information and work recruitment efforts. The College also hosts campus visit events for students interested in CTE programs. In addition, Workforce Outreach Student Success Coordinators regularly publicize dual enrollment to students and parents and/or assist students in identifying pathways and registering for courses.
- 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 service region.
- SJRSC provided evidence for labor market alignment.
- SJRSC provides significant professional learning resources to faculty and staff, including those in CTE programs, through the Center for Learning Culture.
- Resources range from technical assistance to topics of interest to required courses for faculty teaching online. These are examples of professional learning available:
  o Distance Learning Academy for all new full-time faculty who teach online
  o New faculty orientation
  o Annual Faculty Preparation Week and Faculty Convocation
  o Annual Professional Development Day
  o Departmental meetings and trainings

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.

- SJRSC utilizes the Banner Management Information System (MIS).
- SJRSC has a robust checks and balances system to ensure the accuracy of all student data submitted to the state.

- The college has policies and procedures on data collection and offers localized training to CTE and AE administrative staff and teachers via annual training workshops. Training provided by the college includes achieving data quality workshops, best practices seminars and other targeted training as deemed necessary. Administrative staff also attend Division sponsored training and professional learning workshops.
- Twice per semester, State Reporting staff pull student data from Banner and sub data systems. State Reporting staff identify missing or invalid data based on prior reporting knowledge. This data is addressed with internal departments. Once this review is complete, State Reporting staff submit files to the Department.
- 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. Local policies and procedures on testing are also in place.
- 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 SJRSC.
- Records reviewed included:
  - Adult General Education completers and non-completers
  - CTE industry certifications
  - Postsecondary Adult Vocational program completers

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

- Students enrolled in a career certificate program offered for career education credit of 450 hours or more must complete an entry-level basic skills examination after admission into the program and within the first six (6) weeks from the start of the term, unless they meet one of the exemptions. SJRSC administers the Test of Adult Basic Education (TABE) Forms 11 and 12, to assess student mastery of basic skills in the subject areas of reading, language and mathematics. Beginning in the Fall of 2024, SJRSC started CASAS testing.
- The AE department is an integral component of Workforce Connections at SJRSC. Adult education includes a wide range of instructional programs that help adults get the basic skills they need to be productive workers, family members and citizens.
  - Microsoft Office
  - Paraprofessional

  The necessity for these programs was determined by local workforce needs uncovered during the CLNA process.
- SJRSC has a memorandum of understanding (MOU) with CareerSource Northeast Florida to provide workforce training, employment assistance and other services for those interested in workforce programs and/or literacy services. The two work closely to ensure an integrated and efficient delivery of these services. The MOU states the expectations of each party to maximize their effectiveness and avoid a duplication of services provided.

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 college's fixed asset management system.

- Property and Equipment must be tagged and tracked as appropriate to SJRSC procedures (Procedure 4.12), federal, state and grant regulations. As of June 2023, SJRSC's Procedure 4.12 applies to items $5,000 and above. For grants that require tracking relative to a lower threshold, the individual program/project director follows the grant regulations to appropriately tag and track these items. Experts in the Business Office are consulted prior to purchase, contracting and/or buying equipment to ensure compliance.
- A physical inventory is taken annually utilizing property listings, departmental audits of assigned property and verification by the appropriate Property Manager. These inventories are made on a scheduled basis throughout the year and each time there is a change in property custodians. The inventory is made from a master listing of the property and any items not located are reported in writing to the Chief Business Officer. If these items are not located within a reasonable length of time, the custodian of the property furnishes the Chief Business Officer with a written explanation of the shortage or property loss.
- SJRSC reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
- Monitoring staff conducted inventory reviews at two SJRSC campuses and all inventory was accounted for and in its correct location. QAC staff verified inventory at the federal $5,000 threshold, as well as spot checked $1,000 items for internal controls compliance. No issues were uncovered.
- Annual training is provided to all college Property Managers to learn the duties, responsibilities and inventory reports required for their position.

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

- SJRSC 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 were:
- Notification of social security number collection, usage and release
- Student authorization for access to educational records
- FERPA notification
- 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 agreements
- Advisory committee meeting records
- GEPA statement
- Disability Services Manual
- CLNA documentation

- Professional learning calendar
- Records retention policy

G. **<u>FINANCIAL</u>** 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.

- Banner ® is used as SJRSC's financial management system. Purchases, contracts, deliverables and all aspects of procurement are housed within the platform.
- The President is responsible to the Board for the establishment and maintenance of business services and systems that insure the efficient and effective use of all funds that become available to the College. Such business services were developed in keeping with the educational goals of the College and in accordance with the requirements of state and federal laws and regulations. The following components of the procedure's manual were reviewed as part of the monitoring process:
  o Purchasing guidelines and procedures
  o Sole source purchases
  o Budget implementation
  o Cash Management
  o Contracts and bids
  o Purchasing cards (P-card)
  o Inventory Management
  o Procurement
  o Conflict of interests
  o Ethics
  o Travel
- The Business Office, under the direction of the Vice President for Finance and Administration/Chief Financial Officer, provides the Board with an annual report and supplemental reports each month, on the cost of operations of the College and the financial status of the College. Project managers routinely review their grant budgets to keep track of current expenditures and to ensure that there is no cost overrun between object codes. If the scope of a project changes or if funds need to be re-allocated, an amendment is drafted and submitted to the Division.
- SJRSC does issue grant-funded purchasing cards (P-cards). All purchases made with P-cards must receive prior approval and be used solely for the operation of a grant-funded program or when encumbering expenses necessary for tasks such as travel and conferences. When a P-card is used, it is the responsibility of the authorized card holder to submit proper documentation to the Business Office for reconciliation toward the appropriate grant fund. Sample P-card transactions and reconciliations were provided by SJRSC.
- All supplies, equipment and services charged to a grant-funded source are purchased using sound judgement and obtained at the lowest cost possible. Expenditures go toward the operation of programs and fit within the scope of the grant.
- No purchases are authorized without prior approval from the Division via a grant award letter and/or subsequent amendment(s).
- SJRSC provided additional fiscal records such as:
  o Time and effort
  o Procurement
  o Travel
  o P-card transactions

- Monitoring staff conducted a budget analysis of SJRSC's grants. All object codes and dollar amounts pre-approved on their grant award were adhered to.

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.

- SJRSC has numerous collaborations, partnerships and MOUs throughout their service region. These partnerships aid in the expansion and implementation of the core objectives of SJRSC. The list of partners includes, but is not limited to:
  o CareerSource Northeast Florida
  o Beacon of Hope Christian Academy
  o Clay County School District
  o First Coast Technical College
  o Parker-Dewey
  o Putnam County School District
  o St. Johns Classical Academy

VIII. RESULTS

SJRSC was found not to be out of compliance.

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.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 St. Johns River State College monitoring review. A special thanks is offered to Dr. Ellen Burns, for her participation and leadership during this process.

St. Johns River State College
Career and Technical Education
Risk Matrix

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

Agency Name: **St. Johns River State College**
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	7	X 10	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	1	X8	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4 or More	7	3	X 8	24
	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	1	X 4	4
	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:	**152**

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

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

Agency Name: **St. Johns River State College**
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	7	X10	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	3	X 8	24
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	7	X 8	56
	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	0	X 6	0
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	0	X 4	0
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	4	X 4	16
	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	**187**

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

Please address inquiries regarding this report to:

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