



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

**Quality Assurance and Compliance
Onsite Monitoring Visit
for
Adult Education**

Learn to Read, Inc. - Jacksonville

October 21-22, 2019

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Learn to Read, Inc. - Jacksonville
Adult Education
Quality Assurance and Compliance Monitoring Report**

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 the design, development, implementation and evaluation of a comprehensive system of quality assurance 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) Career and Technical Education Act of 2006, 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).

Additional citations noting pertinent laws and regulations and authority to monitor are located in the 2019-2020 Quality Assurance Policies, Procedures, and Protocols, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES AND PROTOCOLS

The Quality Assurance Policies, Procedures and Protocols manual was revised in the 2019-20 program year. The manual is provided to each provider prior to the monitoring visit. The manual provides a summary of each facet of the monitoring design and the process. It also contains protocols that may be used as agencies are monitored or reviewed. References may be made to the manual in this document; 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 Quality Assurance and Compliance 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 monitoring strategy for Learn to Read, Inc. – Jacksonville (LTR) was determined to be an onsite visit. Notification was sent to Mr. Marcus Haile, Executive Director, Learn to Read, Inc. - Jacksonville on August 9, 2019.

The onsite visit to the agency was conducted October 21-22, 2019. The two representatives of the division present during the visit were program specialists Mr. Andrew Goldsmith and Mr. Michael Swift.

V. LEARN TO READ, INC. - JACKSONVILLE

ENROLLMENT: 60

Fiscal Year (FY) 2017-18

The provider was awarded the following grants for FY’s 2017-18, 2018-19 and 2019-20:

Finance

FY 2017-18

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult Education - Corrections	555-1918B-8PC01	\$41,480.00	\$5,066.66

FY 2018-19

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult Education - Corrections	555-1919B-9PC01	\$41,480.00	\$12,260.25

FY 2019-20*

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Adult Education – Corrections	555-1910B-0PC01	\$41,480.00	\$ N/A

*FY 2019-20 project disbursement reports not yet available

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

<http://www.learntoreadjax.org/>

VI. MONITORING ACTIVITIES

The monitoring activities included pre and post visit planning, an entrance and exit conference, records review, inventory review and interviews with administrators.

Onsite Visits

Members of the team made onsite visits to the following locations:

- Learn to Read Jacksonville Office

Entrance and Exit Conferences

The entrance conference for LTR was conducted on October 21, 2019. The exit conference was conducted on October 22, 2019. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Marcus Haile	Executive Director	X	X
Jessica Richter	Program Manager	X	X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X
Andrew Goldsmith	Program Specialist, QAC, FDOE	X	X

Interviews

Interviews were conducted with the administrative staff. All interviews were held during the course of the visit.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, item F. A minimum of 18 student records were reviewed. Policies and procedures were reviewed and discussed at various times during the visit.

VII. RESULTS

- A. ADMINISTRATION:** refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
- Deliverables were verified as being complete.
 - LTR administration works with the Department's grants manager to draft grant applications, prepare deliverable packages, and submit invoices.
 - The program manager for LTR visits program sites to administer tests and collect data.
- B. DATA AND ASSESSMENT:** refers to all the components of the data and assessment system, including test administration, test security, data collection and entry and reporting, as well as procedures. The use of data in program decision-making is also explored and commented upon.
- LTR uses the LACES (Literacy, Adult and Community Education System) software for data collection.
 - Student data is collected and recorded by hand.
 - LTR has reported few instances of students earning Literary Completion Points (LCP).
 - Many LTR students are not receiving enough hours to be eligible for post testing.
 - Through interviews and records review it was determined that LTR has challenges in scheduling and testing students.

FINDING AND ACTION

- Finding B1: LTR has not been collecting or reporting all of the required NRS data elements found in 12-E: Student Data Summary included in the grant request for applications (RFA).
 - Required action B1: LTR is to send a completed Student Data Summary Form with personally identifiable information redacted to the compliance team to ensure all elements are collected and reported going forward.
- Finding B2: The provider failed to inform students, in writing, that their personal and confidential student records will be shared with core partners, subcontractors and other educational sources. This is in violation of the Family Educational Rights and Privacy Act (FERPA) and the Code of Federal Regulations, Title 34, Section 99.30 (34 CFR 99.30).
 - Required action B2: LTR shall create a “release of confidential information” consent form that will be included as part of all student registration packets.

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

- Program officers at the provider’s facilities place students in courses and schedule testing.
- The current schedule of classes includes (2) 2.5 hour classes per week.
- Instructors collect and report attendance.
- If a student misses two consecutive classes they are informed that they will be withdrawn from the program.

FINDING AND ACTION

- Finding C1: LTR is not providing the minimum 10 hours of instruction available to students weekly. This in violation of the Corrections Education Request for Application Section 5. Intensity, Duration, and Flexible Scheduling, C.
 - Required Action C1: LTR is to provide a minimum of 10 hours a week of instruction made available to students at each facility and provide supporting documentation to the Department.

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.

- LTR has no grant-funded equipment purchases or inventory.

E. **ACCESS AND EQUITY:** refers to compliance with the requirements of federal non-discrimination laws as 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 a review of the records and documents that evidence compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.

- There were no issues with the records reviewed.

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.

- The grant manager approves all grant spending.
- Technical assistance was provided on understanding supplanting restrictions.

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.

- Florida State College at Jacksonville

VIII. REQUIRED ACTIVITIES

ADULT EDUCATION

1. Required Action Plan – LTR is required to complete an AE Required Action Plan.

IX. SUMMARY

Once the fieldwork is completed, including receipt of requested information when applicable, a preliminary report is forwarded to the provider for review. Comments are accepted and considered at the discretion of the FDOE Quality Assurance and Compliance section. The final report is completed, forwarded to the agency head with a copy to the appropriate parties, and is posted on the department's website at the following address: <http://fldoe.org/academics/career-adult-edu/compliance>.

Finally, the division issues a closure notice to the agency head and designated contact person. This notice indicates that all outstanding required items have been completed when applicable or that no further action is required.

On behalf of the department, the monitoring team extends our appreciation to all participants in the LTR onsite monitoring visit. Special thanks is offered to Mr. Marcus Haile for his participation and leadership during this process.

APPENDIX A

Agency Name: Learn to Read, Inc. - Duval County Target Year: 2017-2018 Monitoring Year: 2019-2020					
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 Adult Education Grants Combined	Upper Quartile	7	1	X 8	8
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	1	X 8	8
	3	5			
	2	3			
	1	1			
	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	1	X 4	4
	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:					150

Data sources used for calculations: Prior to July 1, 2018

APPENDIX B

Learn to Read Required Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion
Finding B1: LTR has not been collecting or reporting all of the required NRS data elements found in 12-E: Student Data Summary included in the grant request for applications (RFA).	Required action B1: LTR is to send a completed Student Data Summary Form with personally identifiable information redacted to the compliance team to ensure all elements are collected and reported going forward.	LTR will proceed with the required action.	Jan. 31, 2020
Finding B2: The provider failed to inform students, in writing, that their personal and confidential student records will be shared with core partners, subcontractors and other educational sources. This is in violation of the Family Educational Rights and Privacy Act (FERPA) and the Code of Federal Regulations, Title 34, Section 99.30 (34 CFR 99.30).	Required Action B2: LTR shall create a “release of confidential information” consent form that will be included as part of all student registration packets.	LTR will proceed with the required action.	Jan. 31, 2020
Finding C1: LTR is not providing the minimum 10 hours of instruction available to students weekly. This in violation of the Corrections Education Request for Application Section 5. Intensity, Duration, and Flexible Scheduling, C.	Required Action C1: LTR is to provide a minimum of 10 hours a week of instruction made available to students at each facility and provide supporting documentation to the Department.	Our current schedule was developed based on guidance from the Duval County Sheriff’s Office. We will consult with the Sheriff’s Office to review the schedule and determine if required program frequency is possible.	Jan. 31, 2020