

## Quality Assurance and Compliance Virtual Desk Monitoring Review for Career and Technical Education

# Okeechobee County School District

April 5-9, 2021

Final Report

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Florida Department of Education Division of Career and Adult Education

#### Okeechobee County School District Career and Technical 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) Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act, 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 in the 2020-21 Core Monitoring Guide, which is still under review.

#### III. QUALITY ASSURANCE CORE MONITORING GUIDE

The Quality Assurance Policies, Procedures, and Protocols manual was discontinued after the 2019-20 program year. The QAC section will now operate from the Core Monitoring Guide (CMG). The guide provides a summary of each Core Activity and objective of the monitoring design and process.

#### 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 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 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 Okeechobee County School District (OCSD) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Ken Kenworthy, superintendent, Okeechobee County School District on December 1, 2020. The designated representative for the agency was Ms. Lonnie Steiert.

The representative of the division conducting the VDMR was program specialist Mr. Charles Davis of the Quality Assurance and Compliance section.

#### V. Okeechobee County School District

ENROLLMENT:

<u>Fiscal Year (FY) 2018-19</u> CTE (possible duplication at program level): Secondary – 2,155

The provider was awarded the following grants for FY's 2018-19, 2019-20 and 2020-21:

<u>Finance</u> FY 2018-19 Grants	Grant Number	Grant Amount	Unexpended
Perkins CTE Secondary	470-1619B-9CS01	\$ 84,322.00	\$ 6,998.78
Perkins Rural	470-1619B-9CR01	\$ 70,927.00	\$ 4,820.65
Perkins DJJ	470-1619B-9CJJ1	\$ 64,170.00	\$ 372.36
FY 2019-20 Grants Perkins CTE Secondary Perkins Rural	<u>Grant Number</u> 470-1610B-0CS01 470-1610B-0CR01	Grant Amount \$ 95,291.00 \$ 72,502.00	<u>Unexpended</u> \$ 71.07 \$ 317.29
Perkins DJJ	470-1610B-0CJJ1	\$ 127,579.00	\$ 19,566.07
FY 2020-21*			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins Secondary	470-1611B-1CS01	\$ 96,533.00	N/A
Perkins Rural	470-1611B-1CR01	\$ 72,110.00	N/A
Perkins DJJ	470-1611B-1CJJ1	\$ 75,000.00	N/A
Cares Act	470-1230A-1C002	\$ 65,182.00	N/A

\*Final project disbursement reports not available at the time of this writing.

Additional information about the provider may be found at the following web address: <a href="https://www.okee.kl2.fl.us/departments">www.okee.kl2.fl.us/departments</a>

#### VI. MONITORING ACTIVITIES

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

#### Onsite Visits

No onsite visits were made during the VDMR process.

#### Entrance and Exit Conferences

An introductory teleconference for OCSD was conducted on April 5, 2021. The exit teleconference was conducted on April 9, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Ken Kenworthy	Superintendent	Х	Х
Lonnie Steiert	CTE Consultant	Х	Х
Corey Wheeler	Director of Finance	X	Х
Karen Mathews	Student Data Specialist	X	Х
FDOE Monitoring Team			
Charles Davis	Program Specialist, QAC, FDOE	Х	Х
Michael Swift	Program Specialist, QAC, FDOE	Х	Х
Orion Price	Program Specialist, QAC, FDOE	Х	Х

#### Interviews

OCSD administrators were available via teleconference for interviews, if necessary.

#### Records Review

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

#### VII. RESULTS

- A. <u>ADMINISTRATION:</u> refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
  - Superintendent Ken Kenworthy manages the CTE grants for OCSD.
  - The district finance and program staff have further developed their working relationship and schedule meetings to discuss program needs and budget availability.
  - OCSD worked with numerous stakeholders to create the district's comprehensive local needs assessment (CLNA). Those stakeholders will also serve as an advisory committee. A list of District advisory board members and a report of meeting minutes were provided for evidence.
  - OCSD offers ample opportunities for district-wide training and professional development. CTE administrative staff and instructors participate in annual trainings within their program areas, and FDOE sponsored training events and webinars are also attended.
- **B.** <u>**DATA AND ASSESSMENT:**</u> 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.
  - OCSD is currently using the Skyward® management information system (MIS).
  - Skyward® provides users with a step-by-step instruction guide for data entry of both student and financial data. This guide can be kept electronically or printed and kept in hard copy for reference.
  - Frequent trainings by DCAE are attended on MIS requirements, data collection procedures, data entry and other pertinent areas.

- The CTE director and MIS staff work to ensure data submitted is validated by verifying uploads and submissions multiple times throughout the data reporting process and ongoing throughout each school year.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- The district has internal controls that ensure each individual has access to only a specific part of the MIS to prevent too many people from being able to view sensitive student data.
- The CTE director, CTE administration, and other stakeholders, through the district advisory meeting, regularly meet to discuss trends within data reports. These meetings help ensure that all 'grants' objectives are being met and identifying program improvement needs.
- All student-level data was made available to the FDOE monitoring staff during the VDMR.
  - Certiport records with Student Transcripts
  - Industry Certificates (ASE, Animal Science, FADA)
- C. <u>CURRICULUM AND INSTRUCTION:</u> refers to those elements that contribute to student learning and skill acquisition.
  - OCSD offers eight CTE programs at the high school level. Programs include but are not limited to Animal Science and Services, Aquaculture, Automotive Maintenace and Light Repair, and Electrocardiograph technicians.
  - The Board Policy, Chapter 5, was provided for evidence of district enrollment requirements.
  - The district uses the CTE Program Booklet, 8<sup>th</sup> Grade Sneak Peek, Career Planning Guides, media outlets, radio and newspaper, college and career fairs, as well as social media and printed signs to recruit and retain students.
  - No reasonable services and accommodations are denied to those students who self-declare a disability. The Board Policy, 6.43, was provided for evidence of the district disability policy.
  - CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), such as Health Occupations Students of America (HOSA), Future Business Leaders of America (FBLA), and Future Farmers of America (FFA).
  - Professional Development (PD) Sampling was provided for evidence of employee PD.
- **D.** <u>**TECHNOLOGY AND EQUIPMENT:**</u> refers to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.
  - OCSD utilizes the Skyward® system as its integrated management information system (MIS).
  - All inventory criteria set forth by EDGAR and the UGG are included within the inventory management system. The inventory management system was verified during the VDMR.
  - Copies of purchase orders, invoices, and remittance records, of capitalized inventory were reviewed as part of the VDMR process.
  - The district has a technology plan that includes policies on new equipment requests, equipment safety/storage, and old inventory disposal.
  - There have been no reports of stolen or lost equipment over the previous three fiscal years.
- E. <u>ACCESS AND EQUITY:</u> refers to compliance with the requirements of federal nondiscrimination laws as relating to recruitment, enrollment, participation and completion of programs.
  - The Office of Equal Educational Opportunity (OEEO) for school districts 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. <u>**RECORDS REVIEW:**</u> 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.
  - Size, scope and quality review
  - CLNA
  - MIS data quality checklists
  - 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.
  - District professional development and training records agendas, sign-in sheets, training materials, etc.
  - CTE student data review
  - Student progression plans
- 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.
  - The district has financial policies and procedures in place to ensure the efficient cash management of CTE grant funds. The Board Policy (Chapter 7) was provided for evidence.
  - Skyward® is the district Enterprise Resource Planning (ERP) system. The system allows for shared knowledge of expenditures and real-time financial activity. The Skyward® Accounting system prohibits the entry of a requisition unless funds are sufficient to cover the purchase.
  - The district has detailed and thorough procedures for the procurement of equipment and inventory that is funded by its federal grants. The chain of approval for a grant funded purchase is determined by the dollar value of a potential purchase. The superintendent must approve purchases of \$5,000 or more. The Board Policy (Chapter 7) was provided for evidence.
  - OCSD has numerous checks and balances to ensure accurate accounting records. General accepted accounting principles, as published by the Government Accounting Standards Board (GASB), Generally Accepted Accounting Principles (GAAP), State Board of Education Rules, Florida Statute, and District School Board Policies are used in financial accounting and reporting.
  - Budget and financial reports help to determine a grants current financial standing and the likelihood of achieving a grant's financial goals. Budget amendments are submitted to FDOE if the opportunity arises.
  - Monitoring staff conducted a budget analysis of OCSD's FDOE grants. Upon review, the following non-compliance findings were discovered:

(G1): CTE 2018-19, 2019-20 budget narratives which resulted in the DOE399 (final expenditure report) to include the following:

- Expenditures in several object codes (360; 390; 510 and 644) were overspent and no record of any budgetary amendments was submitted to FDOE to authorize the over expenditure.
- Expenditures in the above-referenced object codes are deemed allowable under this federal program. No cost recovery is required.

#### FINDING AND ACTION

- Finding G1: The provider failed to request a budgetary amendment for an increase in their original grant application. This is in violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."
  - Corrective Action G1: (1) The CTE director shall provide a memo of attestation stating the college acknowledges the finding. No other action is required.
- **H.** <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.

OCSD has numerous collaborations, articulation agreements, and MOUs within the local community. They often offer additional educational and job experiences to students within the district. The list of partners include, but are not limited to:

- Indian River State College
- Keiser University
- Quad County Career Pathway Consortium
- Raulerson Hospital
- Okeechobee Health Care Facility
- Grassy Island Ranch (40 acre ranch)

#### VIII. REQUIRED RESOLUTION ACTIVITIES

#### **CAREER AND TECHNICAL EDUCATION**

1. Corrective Action Plan – OCSD is required to complete a CTE Corrective Action Plan.

#### IX. SUMMARY

Once the VDMR is completed, including receipt of additional requested information when applicable, a preliminary report is forwarded to the provider for review. Comments are accepted and will be considered at the discretion of the FDOE monitoring team lead. Once the final report is approved, it will be forwarded to the agency head with a copy sent to the provider designated contact person. The final report will be posted on the department's website at the following address: <u>http://fldoe.org/academics/career-adult-edu/compliance</u>.

Finally, the division issues a closure letter to the agency head and designated contact person. This letter indicates that all outstanding resolution items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

On behalf of the department, the monitoring team extends its appreciation to all participants in the Okeechobee County School District virtual desk monitoring review. Special thanks is offered to Mr. Ken Kenworthy for his participation and leadership during this process.

#### **APPENDIX A**

#### Okeechobee 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: OKEECHOBEE COUNTY SCHOOL DISTRICT Program Type: CTE Target Year: 2018-2019 Monitoring Year: 2020-2021

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7			
	5-6	5	-	<b>V</b> 10	70
	3-4	3	7	<u>X 10</u>	70
	0-2	1			
	Upper Quartile	7			
Total Budget for all Perkins	Upper Middle	5	_	<u>X8</u>	40
Grants Combined	Lower Middle	3	5		
	Lower Quartile	1			
	4 or More	7			
Number of Perkins Grants	3	5	5	vo	40
Number of Ferkins Grants	2	3	5	<u>X 8</u>	
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	- 0	X 6	0
	No	0	U	<u>A0</u>	U
Agency CTE Program Director	Yes	7	0	<u>X 6</u>	0
Change from Previous Fiscal Year	No	0	U	<u><u>A</u>0</u>	U
	Upper Quartile	7			
Unexpended Funds from all	Upper Middle	5			
Perkins Grants Combined	Lower Middle	3	5	<u>X 4</u>	20
Ferkins Grants Combined	Lower Quartile	1	-		
	0	0			
	Upper Quartile	7	-		
Number of Findings from the	Upper Middle	5	-		
Office of the Auditor General	Lower Middle	3	3	<u>X 4</u>	12
State of the function Scherm	Lower Quartile	1	4		
	0	0			
			AGENCY RISK	SCORE:	182

Data sources used for calculations: Prior to July 1, 2019

#### **APPENDIX B**

### Okeechobee County School District Corrective Action Plan

Finding	Corrective Action	Agency Response	Projected Date of Completion		
Finding G1: The provider failed to request a budgetary amendment for an increase in their original grant application. This is in violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."	Corrective Action G1: (1) The CTE director shall provide a memo of attestation stating the district accepts the finding. No other action is required.	<ol> <li>Training grant staff on the rule from the Green Book.</li> <li>Having the Financie Direcotr monitor potential grant expenditures.</li> <li>Conducting periodic reviews to ensure compliance.</li> </ol>	04/23/2021		
Plan submitted by (name and title): Ken Kenworthy- SuperintendentDate: 4/23/2021Plan accepted by: Chuck DavisDate: 4/23/2021					
Status of Action Plan (to be completed by FDOE staff):					
Date: 4/23/2021	Status of Plan Completion: Complete				



## Okeechobee High School CTE Programs/Industry Certifications Earned:

Nursing Academy- Certified Nursing Assistant

Automotive Academy- FADA Certification, NATEF/ASE: Engine Repair, Maintenance & Light Repair, Heating & A/C, Automatic Transmission & Transaxle, Electrical/Electronic System, Engine Performance

Building Construction Academy- HBI (Home Builders Institute): Core, Electrical, Carpentry, Core Green

**Digital Design Academy-** Microsoft Office Specialist, Adobe: Animate, Illustrator, InDesign, Photoshop, Premiere

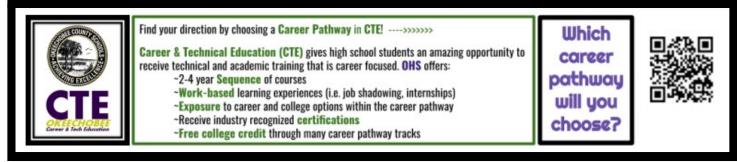
Animal Science Academy- AEST: Agriculture Associate, Agritechnology

Aquaculture Academy- Aquaculture Technician, AEST: Animal Science, Agriculture Associate, Agritechnology

Ag Mechanics Academy- NATEF/ASE: Diesel Engines, AEST: Ag Mechanics, Agriculture Associate, Agritechnology

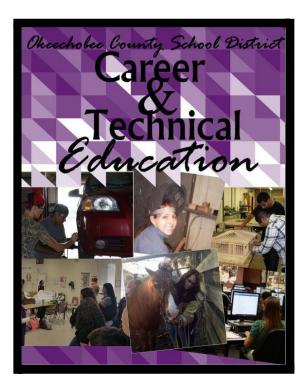


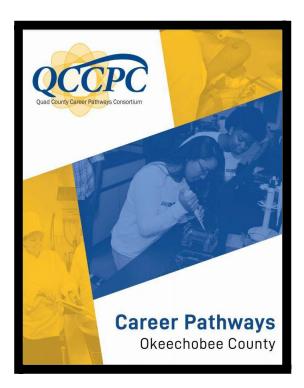
- 18-19 Industry Certifications prior to Spring Break= 139
- 19-20 Industry Certifications prior to Spring Break= 233
- 19-20 Number of Certifications= 256



CTE Guide Chobee.pdf

#### CTE Program Booklet w POS info.pdf





#### Quad County Career Pathways.pdf



CTE Sneak Peek Programs PowerPoint Annual Freshman 8th grade

Visit.pdf

**Okeechobee CTE Highlights:** 

- https://www.facebook.com/290668561108034/posts/1524835934357951/
- <u>https://www.facebook.com/290668561108034/posts/1215505208624360/</u>
- <u>https://www.facebook.com/290668561108034/posts/877201595788058/</u>
- https://www.facebook.com/290668561108034/posts/1190502294457985/
- https://www.facebook.com/290668561108034/posts/1170722179769330/
- https://www.facebook.com/290668561108034/posts/1206534276188120/
- https://www.facebook.com/290668561108034/posts/1244986589009555/
- https://www.facebook.com/290668561108034/posts/1179017368939811/
- https://www.facebook.com/290668561108034/posts/1161922223982659/
- https://www.facebook.com/290668561108034/posts/1398674076974138/
- https://www.facebook.com/2116296631950465/posts/2842344409345680/