

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

St. Johns County School District

November 16 - 20, 2020

Final Report

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Florida Department of Education Division of Career and Adult Education

St. Johns County School District Adult Education and 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 21st 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 located 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 Quality Assurance and Compliance 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 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 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 St. Johns County School District (SJC) was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Tim Forson, superintendent, St. Johns County School District on August 28, 2020. The designated representative for the agency was Ms. Emily Harrison

The representative of the division conducting the VDMR was program specialist, Mr. Michael Swift of the Quality Assurance and Compliance section.

V. ST. JOHNS COUNTY SCHOOL DISTRICT

ENROLLMENT:

Fiscal Year (FY) 2018-19

CTE (possible duplication at program level): Secondary - 11,210; Post-secondary - 776

AE: 343

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

<u>Finance*</u> FY 2018-19					
<u>Grants</u>	Grant Number	Gr	ant Amount	Ur	nexpended
Adult General Education	550-1919B-9CG01	\$	166,564.00	\$	0.00
Adult Education – IELCE	550-1939B-9CE01	\$	25,956.00	\$	5,875.35
Adult Education – Corrections	550-1919B-9CC01	\$	90,920.00	\$	11,492.35
Perkins Secondary	550-1619B-9CS01	\$	227,283.00	\$	10,440.97
Perkins Post-Secondary	550-1619B-9CP01	\$	169,521.00	\$	11,521.08
Perkins DJJ	550-1619B-9CJJ1	\$	45,738.00	\$	58.92
FY 2019-20*					
<u>Grants</u>	Grant Number	Gr	ant Amount	Ur	<u>nexpended</u>
Adult General Education	550-1910B-0CG01	\$	166,564.00	\$	1,235.02
Adult Education – IELCE	550-1930B-0CE01	\$	25,956.00	\$	N/A
Adult Education – Corrections	550-1910B-0CC01	\$	90,920.00	\$	14,601.31
Perkins Secondary	550-1610B-0CS01	\$	266,120.00	\$	88,472.62
Perkins Post-Secondary	550-1610B-0CP01	\$	157,324.00	\$	2,799.34
FY 2020-21*					
<u>Grants</u>	Grant Number	Gr	ant Amount	Ur	<u>nexpended</u>
Adult General Education	550-1911B-1CG01	\$	166,564.00	\$	N/A
Adult Education – IELCE	550-1931B-1CE01	\$	25,956.00	\$	N/A
Adult Education – Corrections	550-1911B-1CC01	\$	90,920.00	\$	N/A
Perkins Secondary	550-1611B-1CS01	\$	60,332.00	\$	N/A
Perkins Post-Secondary	550-1611B-1CP01	\$	140,335.00	\$	N/A

Additional information about the provider may be found at the following web address: https://www.stjohns.k12.fl.us/

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 SJC was conducted on November 16, 2020. The exit teleconference was conducted on November 20, 2020. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Emily Harrison	Director, Career and Technical Education	X	X
Katie Maltby	Program Specialist, Career and Technical Education	X	X
Theresa Dodd	Executive Secretary, Career and Technical Education	X	X
Stephanie Finley	Teacher on Assignment, Career and Technical Education	X	X
Chris Force	Principal, First Coast Technical College	X	X
Donna Gary-Donovan	Assistant Principal, First Coast Technical College	X	X
Patrick Falhive	Program Specialist, Adult Education First Coast Technical College	X	X
Shawnna Young	Reporting Analyst, First Coast Technical College	X	X
FDOE Monitoring Team			
Michael Swift	Program Specialist, QAC, FDOE	X	X
Charles Davis	Program Specialist, QAC, FDOE	X	X

Interviews

SJC 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.

^{*} Final project disbursement reports not available at the time of this writing.

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.
 - SJC has thorough policies and procedures that dictate the approval process that takes place prior to a grant application being submitted to FDOE. The AE and CTE directors work with their department heads, advisory committees and district finance staff to assess the needs of their particular programs. Once those needs are addressed and included in the grant applications, they are reviewed and approved by the superintendent.
 - Once approved by FDOE the AE and CTE grants for SJC are managed by separate teams of
 individuals, but both program areas follow the same procedures for financial tracking and
 oversight.
 - The comprehensive local needs assessment (CLNA) included in the SJC Perkins grants
 required consultation with numerous community and business leaders. These stakeholders
 include: teachers; local business owners; community leaders; and other educational
 specialists. Secondary advisory committees and post-secondary steering committees will
 continue to provide ongoing reviews and updates to the CLNA.
 - SJC offers ample opportunities for district-wide training and professional development. AE and CTE administrative staff participate in annual conferences 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.
 - SJC utilizes the FOCUS® system for post-secondary and Adult Education, and PowerSchool® for K-12 as their integrated student information system (SIS) and management information system (MIS).
 - Frequent trainings are provided to administrative staff on National Reporting System requirements (AE only), data collection procedures, data entry and other pertinent areas of the MIS. Administrative staff also participate in FDOE sponsored trainings such as ACE, Summer Symposium, FACTE and WEDDAC.
 - All of the data elements required of their local MIS were included in the system and verified during the desk review.
 - District registration forms include student "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
 - Program staff verify student data prior to the records being uploaded to the SIS. Data is then run through edit reports within the SIS to ensure accuracy prior to submission to the state.
 - 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 AE and CTE directors regularly meet with their administrative staff to discuss trends within data reports. These meetings help to ensure that program and grant objectives are being met.
 - Samples of AE and CTE student data was reviewed and verified for accuracy as part of the VDMR. All student records were provided by SJC.

- **C.** <u>CURRICULUM AND INSTRUCTION:</u> refers to those elements that contribute to student learning and skill acquisition.
 - The CTE program is guided by a strong advisory committee that offers program recommendations, insight into current industry trends and updates on local workforce needs. The AE program also has a regional advisory committee that meets twice per year.
 - The district provides resources such as CareerSource, Florida Ready to Work and the Life Work program to assist students with their studies.
 - No reasonable services and accommodations are denied to those students who self-declare a disability.
 - CTE students have the opportunity to participate in multiple Career and Technical Student Organizations (CTSO), internships and other work based learning.
 - AE instructors are trained to incorporate CTE skills and related content into daily classroom instruction. AE instructors also meet monthly with post-secondary CTE staff to discuss programs/opportunities for current AE students at First Coast Technical College (FCTC).
 - The district has a memorandum of understanding (MOU) with CareerSource Northeast Florida to provide career services and training for students.
 - Tests of adult basic education (TABE) and the comprehensive adult student assessment system (CASAS) are used for student skill level assessment. All TABE and CASAS test proctors are certified as required by FDOE and the testing companies.
- **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.
 - All inventory criteria set forth by EDGAR and the UGG is included within the inventory management system. The inventory management system was verified during the VDMR.
 - Photographic evidence of inventory was reviewed as part of the VDMR process.
 - The district has a technology plan that includes policies on new equipment requests, equipment safety/storage and disposal of old inventory.
 - 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 non-discrimination 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. 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.
 - 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.
- AE and CTE student data review
- **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 management of CTE and AE grant funds.
 - SJC utilizes Business Plus as their Enterprise Resource Planning (ERP) system. The system allows for shared knowledge of expenditures and real time financial activity.
 - 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. All purchases above \$25,000 must receive final approval from the district Board of Directors.
 - SJC has numerous checks and balances to ensure accurate accounting records. Bookkeepers
 and accounting specialists work with program directors to keep track of all grant funded
 expenditures.
 - Program directors and administrative staff meet weekly to review expenditure reports and to determine a grants current financial standing. Budget amendments are submitted to FDOE if the opportunity arises.
- **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.
 - SJC 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 include, but are not limited to:
 - o CareerSource Northeast Florida
 - o Florida State College at Jacksonville
 - University of North Florida
 - Northrop Gruman
 - o Florida Virtual School
 - o First Coast Technical College

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan – SJC is not required to complete a CTE Corrective Action Plan.

ADULT EDUCATION

1. Corrective Action Plan – SJC is not required to complete an AE 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: http://fldoe.org/academics/career-adult-edu/compliance.

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 St. Johns County School District virtual desk monitoring review. Special thanks is offered to Ms. Emily Harrison for her participation and leadership during this process.

APPENDIX A

St. Johns 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: ST. JOHNS COUNTY SCHOOL DISTRICT

Program Type: **CTE**Target Year: **2018-2019**Monitoring Year: **2020-2021**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7	· ·	<u>X 10</u>	
Number of Years Since Last	5-6	5	3		30
Monitored	3-4	3	3		30
	0-2	1			
	Upper Quartile	7	5		
Total Budget for all Perkins	Upper Middle	5		37.0	40
Grants Combined	Lower Middle	3		<u>X8</u>	40
	Lower Quartile	1			
	4 or More	7			
Namel and Charles Court	3	5	_	<u>X 8</u>	40
Number of Perkins Grants	2	3	5		40
	1	1			
Change in Management Information Systems (MIS)	Yes	7	0	<u>X 6</u>	0
from Previous Fiscal Year	No	0			U
Agency CTE Program Director Change from Previous Fiscal	Yes	7	7	<u>X 6</u>	42
Year	No	0	,		42
	Upper Quartile	7		<u>X 4</u>	
Unexpended Funds from all	Upper Middle	5			
Perkins Grants Combined	Lower Middle	3	7		28
Terkins Grants Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7			
Number of Findings from the	Upper Middle	5	7	<u>X 4</u>	
Office of the Auditor General	Lower Middle	3			28
office of the Munitor General	Lower Quartile	1			
	0	0			
			AGENCY RISK	SCORE:	208

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

St. Johns County School District Adult Education Risk Matrix

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

Agency Name: **ST. JOHNS COUNTY SCHOOL DISTRICT** Program Type: **AE**

Program Type: **AE**Target Year: **2018-2019**Monitoring Year: **2020-2021**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More Years	7			
Number of Years Since Last	5-6	5	3	<u>X10</u>	30
Monitored	3-4	3	3	<u>X10</u>	30
	0-2	1			
	Upper Quartile	7		<u>X 8</u>	
Total Budget for all Adult	Upper Middle	5	7		56
Education Grants Combined	Lower Middle	3	/		50
	Lower Quartile	1			
	4 or More	7		W 0	
Number of Adult Education	3	5	_		40
Grants	2	3	5	<u>X 8</u>	40
	1	1			
Change in Management Information Systems (MIS)	Yes	7	0	<u>X 6</u>	0
from Previous Fiscal Year	No	0			U
Agency AE Program Director Change from Previous Fiscal	Yes	7	7	<u>X 6</u>	42
Year	No	0			
	Upper Quartile	7	5	<u>X 4</u>	
Unexpended Funds from all	Upper Middle	5			
Adult Education Grants	Lower Middle	3			20
Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7		<u>X 4</u>	
Number of Findings from the	Upper Middle	5			28
Office of the Auditor General	Lower Middle	3	7		
Office of the Additor General	Lower Quartile	1			
	0	0			
	Target Not Met				
	on 3 of 3	5			18
	Indicators				
Adult Education Program	Target Not Met on 2 of 3 Indicators	3	3	<u>X 6</u>	
Improvement Plan (AEPIP)	Target Not Met on 1 of 3 Indicators	1			
	All targets met	0			
	Till ungets met	<u> </u>	Agency Ri	al Come	234

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