

# **Quality Assurance and Compliance**

# Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant

**Broward County Public Schools** 

February - May 2024

**Final Report** 

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Florida Department of Education Division of Career and Adult Education

#### Broward County Public Schools Pathways to Career Opportunities Grant (PCOG) 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

Pursuant to Section 1008.32, Florida Statues, Rule 6A-20.046, Florida Administrative Code, the Pathways to Career Opportunities Grant Request for Proposal and the Uniform Grant Guidance, also referred to as 2 Code of Federal Regulations Part 200, the Department is responsible for monitoring programs run by a sub-grantee or provider of supported activities to ensure adherence to relevant federal and state regulations.

#### 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. You can find the guide on the Division's website at <a href="http://fldoe.org/academics/career-adult-edu/compliance">http://fldoe.org/academics/career-adult-edu/compliance</a>. The QAC office may apply any specific monitoring strategy to any federal or state-funded provider at any time. Some circumstances may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

#### **IV. PROVIDER SELECTION**

The Broward County Public Schools (BCPS) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Peter Licata\*, Superintendent, on November 15, 2023. The designated representative for the agency was Ms. Neeta Rancourt, Director, Atlantic Technical College and Technical High School (ATC).

The Division's representative conducting the VDMR was Program Specialist Michael Swift of the QAC.

\* Dr. Licata is no longer the Superintendent of Schools. Dr. Howard Hepburn assumed the role in April of 2024.

# V. BROWARD COUNTY PUBLIC SCHOOLS

The provider was awarded the following grant(s) for the fiscal years (FY) 2020-21, 2021-22 and 2022-23.

#### **Finance**

FY 2091-20			
Grants	Grant Number	Grant Amount	Unexpended
Pathways to Career	060-90310-0D001	\$ 518,117.00	\$ 607.75
Opportunities	060-90310-0D002	\$ 65,989.00	\$ 148.98
FY 2020-21			
Grants	Grant Number	Grant Amount	Unexpended
Pathways to Career	060-90310-1D301	\$ 41,000.00	\$ 0.32
Opportunities	060-90310-1D302	\$ 439,500.00	\$ 209,540.28
	060-90310-1D303	\$ 186,300.00	\$ 108,944.42
FY 2021-23			
Grants	Grant Number	Grant Amount	Unexpended
Pathways to Career	060-90310-35501	\$ 132,946.00	\$ 50,922.98
Opportunities			

Additional information about the provider may be found at the following web address: <u>https://www.browardschools.com/</u>

#### 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

Although the monitoring review was virtual, an inventory review was done in conjunction with another onsite monitoring review the QAC team was conducting in the geographical area:

• Atlantic Technical College – Coconut Creek

#### Entrance and Exit Conferences

An introductory telephone meeting with Ms. Rancourt took place on January 12, 2024. An exit telephone meeting took place on July 25, 2024 to inform her of the final standing of the monitoring review.

Name	Title	Entrance Conference	Exit Conference
Neeta Rancourt	Director, ATC, BCPS	Х	Х
Jennifer Escandell	Director, Grants Administration, BCPS	Х	
Christy Bradford	Curriculum Supervisor, BCPS	Х	
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	Х	Х
Chuck Davis	Program Specialist, QAC	Х	

#### VII. OBSERVATION

- A. <u>ADMINISTRATION</u> refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
  - BCPS's PCOG grant is managed by the director at ATC. She is an experienced administrator in career and technical education and other facets of workforce education.
  - ATC houses a dedicated apprenticeship office that assists in managing the PCOG grant and assists in ensuring all programmatic needs are met.
  - Advisory Boards and collaborative partners assist with determining the use of the PCOG funds and provide ongoing consultation in support of the programs and executing the requirements of the grant.
  - Deliverables are submitted to the Division on time, and grant amendments are submitted with minimal errors.
- **B.** <u>**DATA AND ASSESSMENT**</u> 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.
  - The Division's Office of Research and Evaluation requested that the monitoring staff confirm BCPS's PCOG enrollment numbers submitted to the state via the PK-12 Education Information Services (EIS) database. Enrollment data was requested for the following occupations associated with PCOG funded apprenticeship programs:
    Carpentry
  - BCPS provided sufficient enrollment data and documentation, as required by the state.
  - All documentation was provided by BCPS, as part of the monitoring review.
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to elements contributing to student learning and skill acquisition.
  - In consultation with CareerSource (CS) Broward, local labor alliances and through multiple letters of support from numerous entities in their service region, BCPS determined the best usage of their PCOG funding was for the support of existing Registered Apprenticeship (RA) programs and the creation of new RA programs. Existing RA programs include Yacht Service Technician, Machinist and Carpentry. New RA programs to be developed with PCOG funds included Security and Fire Alarm Installers and a pre-apprenticeship in Carpentry.
  - BCPS and ATC have over 40 years of experience in training, graduating and employing apprentices throughout the state of Florida. This has resulted in long-standing relationships with local businesses that are eager to support the implementation of their programs.
  - Apprentices and pre-apprentices enrolled in PCOG funded programs receive Related Technical Instruction at one of the district's technical college campuses, while participating in on the job training with one of its many sponsors within the BCPS service region.
- **D.** <u>**TECHNOLOGY AND EQUIPMENT**</u> refer 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 inventory management system. The inventory management system was verified during the VDMR.

- BCPS does have policies and procedures on property management, equipment safety/storage and inventory disposal.
- Program site leaders (principal and/or program director) act as the custodians of all equipment housed at their location.
- BCPS utilizes a Surplus/Transfer Declaration Form that tracks the movement of equipment if it is moved from its initial location. The issuing and receiving property custodian must approve the form prior to submission to the Accounting and Finance Office. Property files are also maintained at each site/campus.
- BCPS conducts semi-annual district-wide inventory of all capitalized equipment (\$1,000 threshold). Although tangible personal property purchases with a unit value less than \$1,000 are not maintained on the District's Master File of Capital Assets database, property custodians must take appropriate precautions to safeguard all equipment at a given location.
- Any missing or misplaced items must be reported immediately by the property custodian of the location in which the property should be found. In the event of theft or vandalism, the property custodian will report the loss to the Broward District Schools Police Department and the local police authorities at the time of the incident.
- BCPS did not report any instance of lost, stolen or damaged capitalized equipment purchased with PCOG funds.
- E. <u>EQUAL ACCESS</u> refer to compliance with federal non-discrimination law requirements relating to recruitment, enrollment, participation and completion of programs.
  - BCPS included the necessary policies required by the General Education Provisions Act and other federal laws which ensure equal access and participation in programs regardless of sex, race, national origin, color, disability or age.
- F. <u>RECORDS REVIEW</u> 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:

- District policies and procedures for finance and procurement
- District policies and procedures for property accounting and inventory management
- Procurement records
- Inventory records
- Travel records and reimbursement procedures
- Final Project Disbursement Report
- Time and effort reports
- Deliverable reports provided to the Division
- 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.
  - SAP® is used as the BCPS financial management system. The PCOG director and other administrators use reports generated by the system to ensure the appropriate handling and allocations of grant funds.
  - BCPS's Fiscal Policy Manual ensures the efficient management of grant funds. The following procedural manuals were reviewed:
    - Procurement thresholds
    - Methods of procurement

- Contract management
- Cash management
- Budgeting
- o Travel
- BCPS works with the PCOG program manager to ensure all expenditures are allowable by law and able to be funded with state grant dollars. Regular meetings are held with program administrators and finance staff to determine the current financial standings of each grant, and to ensure that grant expenditures are being managed properly. Budget amendments are submitted to the Division if the opportunity arises.
- Once a purchase has been authorized, the procurement method is determined based on the price of the item(s). Procurement records were provided as part of the monitoring review.
- The district does not use grant funded purchasing cards for PCOG expenditures.
- **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.
  - BCPS has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within their service area. The list of partners includes but is not limited to:
    - CS Broward
    - South Florida Manufacturers Association
    - Atlantic Technical College
    - Treasure Coast Builder Association
    - Apex Machine Company
    - Florida Carpenters Apprenticeship Program
    - South Florida Manufacturers Association
    - o Associated Builders and Contractors Institute

# VIII. RESULTS

BCPS was not found 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 you can find at:

https://www.fldoe.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 Broward County Public Schools VDMR. A special thanks is offered to Ms. Neeta Rancourt for her participation and leadership during this process.

Please address inquiries regarding this report to:

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