FLORIDA DEPARTMENT OF EDUCATION

CAREER AND ADULT EDUCATION

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

South Florida State College

April - May 2024

Final Report

TABLE OF CONTENTS

Florida Department of Education
Division of Career and Adult Education
South Florida State College
Perkins Career and Technical Education
And
Adult Education
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. You can find the guide on the Division's website at http://fldoe.org/academics/career-adult-edu/compliance. 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

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 South Florida State College (SFSC) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Mr. Fred Hawkins, President, on November 15, 2023. The designated representative for the agency was Ms. Michelle Leidel, Dean, Division of Applied Sciences and Technology.

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

V.   SOUTH FLORIDA STATE COLLEGE

Finance
The provider was awarded the following grants for fiscal years (FY) 2020-21, 2021-22 and 2022-23:

FY 2020-21			
Grants	Grant Number	Grant Amount	Unexpended
Adult Education - AGE	282-1911B-1CG01	$ 38,560.00	$ 0.00
Adult Education - AGE	282-1931B-1CG02	$ 206,223.00	$ 0.00
Adult Education - IELCE	282-1931B-1CE01	$ 43,156.00	$ 0.00
Adult Education - IELCE	282-1931B-1CE02	$ 30,900.00	$ 0.00
Perkins Postsecondary	282-1611B-1CP01	$ 260,873.00	$ 0.00
FY 2021-22			
Grants	Grant Number	Grant Amount	Unexpended
Adult Education - AGE	282-1912B-2CG01	$ 38,000.00	$ 0.10
Adult Education - AGE	282-1912B-2CG02	$ 227,448.00	$ 1,984.58
Adult Education - IELCE	282-1932B-2CE01	$ 32,725.00	$ 0.00
Adult Education - IELCE	282-1931B-2CE02	$ 65,721.00	$ 0.00
Perkins Postsecondary	282-1612B-2CP01	$ 248,871.00	$ 0.00
FY 2022-23			
Grants	Grant Number	Grant Amount	Unexpended
Adult Education - AGE	282-1913C-3CG01	$ 38,000.00	$ 0.00
Adult Education - AGE	282-1913C-3CG02	$ 204,948.00	$ 0.00
Adult Education - IELCE	282-1933B-3CE01	$ 107,725.00	$ 0.00
Adult Education - IELCE	282-1933B-3CE02	$ 150,221.00	$ 0.00
Perkins Postsecondary	282-1613B-3CP01	$ 283.491.00	$ 0.00

Additional information about the provider may be found at the following web address:
https://www.southflorida.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:
- SFSC – Highlands Campus
- SFSC – Hardee Campus
- SFSC – DeSoto Campus
- SFSC – Lake Placid Campus

Entrance and Exit Conferences
The entrance conference for SFSC was conducted on May 1, 2024. The exit conference was conducted on May 21, 2024. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Michelle Leidel	Dean, Applied Sciences and Technology	X	X
Anastasia Fuchser	Coordinator, Institutional Advancement and Alumni Development	X	
June Weyrauch	Coordinator, Grants Development and Federal Relations	X	
Teresa Vorous	Controller	X	
Katie Joyner	Administrative Assistant, Applied Sciences	X	
Kathleen Cappo	Dean. Health Sciences	X	
Michele Heston	Vice President for Academic Affairs and Student Services	X	
April Ricker	Coordinator, Grants and Foundation Accounting	X	X
Courtney Green	Director, Adult Education and Technical Dual Enrollment	X	X
Peter Ellio	Vice President, Administrative Services	X	X
Jaime Bateman	Vice President, Institutional Advancement and External Affairs		X
Chris van der Kaay	Dean, Institutional Effectiveness		X
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	X	X
Chuck Davis	Program Specialist, QAC	X	

<u>Interviews</u>
No interviews were conducted as part of the OSMR. SFSC submitted thorough and qualitative documentation and evidence to support the QAC Core Activities.

<u>Records Review</u>
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 SFSC CTE and AE grants are managed by knowledgeable program managers and coordinators with numerous years of experience within their respective program areas and postsecondary education. They work directly with administrators and faculty to determine the needs of each program area, and to determine if those needs fit within the scope of their federal award(s). Additionally, the program managers and coordinators are responsible for ensuring compliance with the specific laws, terms and conditions of the federal award.
- The Division grant manager for SFSC reported that grant applications and amendments are routinely submitted on time and typically require little to no additional guidance. If revisions are needed, the program directors submit those in a prompt manner.
- As part of the required comprehensive local needs assessment (CLNA), SFSC postsecondary 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 population students. The list of stakeholders includes, but is not limited to:
  o CareerSource Heartland – Representatives of local workforce board
  o The School Board of Highlands County, Hardee County Schools and DeSoto County Schools – Local secondary educational agency representatives
  o SFSC faculty and staff – Postsecondary representatives
  o SFSC, Counselor and Disabilities Specialist – Special populations
  o Vocational Rehabilitation – Individuals with disabilities representative
  o Take Stock in Children, Farmworker Career Development Program and Panther Youth Partners – Out-of-school youth, homeless children and youth at-risk
  o Local business owners (private and public)
  o Parents and students
- In addition to their Labor Market Analysis, SFSC also received multiple letters of support from numerous public entities that spoke of the need for some programs represented in their CLNA. These letters of support represent programs that aren't included on the local occupation demands report.
- All CTE programs benefit from strong business and industry relationships and strong advisory committees. These committees are comprised of individuals who assist with the design, development and implementation of CTE programs. In addition to serving in an advisory capacity, they also provided input during the CLNA process. All advisory committees meet multiple times throughout the school year.

- SFSC conducts ongoing professional learning and training to ensure all CTE and AE administrative staff are up to date on any changes that come from the federal and/or state-level Department of Education. Department-sponsored training events are also attended. SFSC provided multiple records of training and learning events.

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.

- SFSC utilizes Banner® as it's integrated Management Information System (MIS) and student information system. The MIS meets all Department requirements as defined by the Data Dictionary.
- SFSC has written procedures for the collection, verification, analysis and reporting of student data. Division policies on the submission of student data are also adhered to and followed.
- The State Reporting Coordinator (SRC) is responsible for state reporting and ensuring that data submission requirements and reporting deadlines are met. The SRC is also responsible for collaborating with AE and CTE directors and coordinators to ensure effective analysis, interpretation and evaluation of student data prior to submission to the Division.
- SFSC provided assessment policies and procedures for all administrators who proctor the Test of Adult Basic Education (TABE) and the Comprehensive Adult Student Assessment System (CASAS). Those policies and procedures included administrative training requirements; test security; test scheduling; and administering the assessments.
- All TABE and CASAS proctors are certified in accordance with the Division and each testing agency. Administrator certifications were provided by SFSC and reviewed as part of the monitoring process.
- SFSC provides students with the following notification(s) regarding the use and dissemination of student data:
  o Notification of social security number collection, usage and release.
  o Student authorization for access to educational records.
  o Student and parental rights provided by the Family Educational Rights and Privacy Act (FERPA).
  Students may opt in or out of these notices at any time.
- The SRC and appropriate administrators attend Division events such as quarterly webinars and Management Information System Advisory Task Force meetings. Other professional learning events are attended when the opportunity is available.
- Samples of CTE and AE student data were reviewed and verified for accuracy as part of the OSMR. All student records were provided by SFSC. Records reviewed included:
  o AGE completers and non-completers
  o CTE industry certifications
  o Postsecondary Adult Vocational program completers

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

- SFSC offers CTE on all campuses within their service area, while AE services are provided at three campuses, the Hardee County jail and the Highlands County jail. Multiple organizations such as local churches partner with SFSC to offer AE programs directly in the communities that need them most. This allows students with barriers that would prevent them from attending on-campus classes to have opportunities closer to their homes.

- SFSC has a memorandum of understanding (MOU) with CareerSource Heartland 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 those services. The MOU states the expectations of each party to maximize their effectiveness and avoid a duplication of services provided.
- In partnership with DeSoto County Schools, Hardee County Schools and the School Board of Highlands County, SFSC offers high performing students the opportunity to participate in dual enrollment (DE) courses with the college. Students enrolled in DE courses with SFSC can obtain college credits, along with Workforce credentials and certifications applicable to their course of study.
- SFSC offers students multiple opportunities to participate in additional learning activities outside of the classroom.
  - The cosmetology clinic and dental hygiene lab both offer services available to the general public for a nominal fee depending on the services provided. Services are performed by students under direct supervision of a licensed instructor.
  - Hotel Jacaranda is a historic hotel purchased by SFSC in 1988. Through a partnership with the Culinary Arts program, students gain hands on experience operating and running a fine dining establishment and preparing the daily menus at the onsite restaurant.
  - Agreements are in place for health science students to receive clinical hours in live medical settings that go toward their program completion.
  - Multiple clubs and student organizations are available for students to participate in program themed learning environments.
- There is a collaborative effort between the AE and Workforce programs to help Integrated English Literacy and Civics Education (IELCE) learners not only attain literacy skills, but also transition into postsecondary education and/or receive simultaneous training for gainful employment. Students currently enrolled in IELCE programs can participate in Integrated Education and Training (IET) programs. SFSC currently offers Certified Nursing Assistant.
- In compliance with Section 504 of the Rehabilitation Act of 1973 no student who self-declares a disability is denied appropriate and reasonable accommodation as determined by the student's needs and available college resources. SFSC disseminates information on available resources and how to request them through the college Disabilities Specialist.
- SFSC offers ample professional learning and training to AE and CTE administrators and staff. Instructors also participate in ongoing training provided by the Division, as well as annual professional learning through the college. Program-specific training and/or certification is also completed as required.

D.   **TECHNOLOGY AND EQUIPMENT** 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 college's fixed asset management system.
- SFSC has policies and procedures on property management, equipment safety/storage, inventory reconciliation and inventory disposal. In addition to these policies and procedures, SFSC has internal controls and procedures to govern loss prevention, transfer of property and the surplus of capital equipment. Property control records are housed within the college Business Office.
- The college President and Controller are ultimately responsible for property, equipment and inventory management across all campuses, but each campus has a Property Custodian that is

responsible for all equipment at his or her site. The Property Custodian is also responsible for safeguarding equipment against theft and maintaining equipment.

- Additionally, it is the responsibility of the Property Custodian to notify the Business Office of any changes in location, value or custodianship of all equipment under their watch.
- The Business Office must be notified in writing if equipment is to be moved from its primary location. Equipment can only be moved for program-related needs, repair, disposal or storage and must be approved via a Transfer or Disposal of Property Form.
- Capitalized equipment is inventoried at least annually, and all inventoried property must match the records maintained within the Business Office. Property Custodians must notify the Property Accountant, in writing, of any property that is lost, stolen or missing. The Property Accountant will notify the appropriate law enforcement agency, if applicable, and will forward all written documents to the Controller. The individual conducting the visual inventory shall not be the assigned Property Custodian at any given location.
- SFSC reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
- Monitoring staff conducted inventory reviews at four SFSC campuses and all inventory was accounted for and in its correct location. The capitalized inventory monetary threshold is $5,000.

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

- SFSC 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 are:
- 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
- Fiscal and operational policies and procedures
- CASAS certifications
- Multiple MOUs
- DE articulation agreement
- IET Program of Study
- DE guide and sample agreements
- Consortium and advisory committee meeting records
- Travel records
- Professional learning materials
- GEPA statement
- Disability Services Manual
- CLNA documentation

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.

- Banner® is used as SFSC's financial management system. Purchases, contracts, deliverables and all fiscal aspects are housed within the system. Equipment and property transaction records are also maintained within Banner®.
- SFSC Financial Administrative Procedures provide the duties and responsibilities of all employees who make procurement decisions and conduct financial transactions for the college. The following components of procedures manual were reviewed as part of the monitoring process:
  - Purchasing guidelines and procedures
  - Sole source purchases
  - Budget implementation
  - Cash management
  - Contracts and bids
  - Purchasing cards (P-card)
  - Inventory management
  - Procurement
  - Conflict of interests
  - Ethics
  - Travel
- Project managers and coordinators work closely with the Business Office and grant accountant. All parties work together to monitor grant budgets and balances to ensure that expenditures charged to their federal grant are available when needed.
- 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 will be drafted and submitted to the Division.
- SFSC does use grant-funded purchasing cards (P-card) for minor expenditures. 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 SFSC.
- All supplies, equipment and services charged to a grant-funded source shall be purchased using sound judgement and obtained at the lowest cost possible. Expenditures must go towards the operation of programs within the scope of the grant.
- No purchases are authorized without prior consent via an approved purchase order (PO). POs are initiated by a purchase requisition, request for funds or after receiving authorization for P-card use. The dollar value of a purchase ultimately dictates the procurement method used to acquire the goods or services.
  - Less than $5,000 – Requires the approval of a Dean or Vice President.
  - $5,000 but less than $19,999 – Require at least three telephone quotes.
  - $20,000 but less than $64,999 – Require at least three written quotes.
  - Purchases exceeding $65,000 – Require three or more formal sealed bids or proposals. The President and the SFSC Board of Trustees will provide final approval of the selected bid or proposal.

- The Purchasing Coordinator serves as the contract manager for any agreements entered that use federal grant dollars. This individual also oversees the preparation of POs and assists in the competitive bidding process, when necessary.
- SFSC provided additional fiscal records such as:
  - Time and effort
  - Procurement
  - Travel
  - P-card transactions

  All records were in accordance with applicable local, state and federal law.

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.

- SFSC has numerous collaborations, partnerships and MOUs throughout their service region. These partnerships aid in the expansion and implementation of the core objectives of SFSC. The list of partners includes, but is not limited to:
  - CareerSource Heartland
  - Advent Health
  - Duke Energy
  - School Board of Desoto County
  - Highlands County Schools
  - Hardee County Schools
  - Manatee Technical College
  - Ridge Technical College
  - Travis Technical College
  - Suncoast Technical college

VIII.   RESULTS

SFSC 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:
http://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.

The monitoring team would like to extend their appreciation to all participants in the South Florida State College monitoring review, on behalf of the Division. A special thanks is offered to Ms. Michelle Leidel for her participation and leadership during this process.

South Florida 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: **South Florida 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	**5**	X 10	**50**
	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	**5**	X 8	**40**
	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	**0**	X 6	**0**
	No	0			
Unexpended Funds from all Perkins 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	**1**	X 4	**4**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
			AGENCY RISK SCORE:		**102**

Data sources used for calculations: Prior to July 1, 2022

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

Agency Name: **South Florida 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	3	X10	30
	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	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			
Adult Education Program Improvement Plan (AEPIP)	Target Not Met on 3 of 3 Indicators	5	4	X 6	24
	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	**142**

Data sources used for calculations: Prior to July 1, 2022

Please address inquiries regarding this report to:

Kara Kearce
Director of Quality Assurance and Compliance
Kara.Kearce@fldoe.org
850-245-9033

Florida Department of Education
Division of Career, Technical and Adult Education
325 West Gaines Street · Room 722A
Tallahassee, Florida 32399