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**

School District of Indian River County

November 4-8, 2024

Final Report

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**School District of Indian River County
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 https://www.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 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.

School District of Indian River County (SDIRC) monitoring strategy was determined to be an onsite monitoring review (OSMR). Notification was sent to Dr. David Moore, Superintendent, August 16, 2024. The designated representative for the agency was Ms. Christi Shields.

The Division's representative conducting the OSMR was Program Specialist Chuck Davis of the QAC.

V.   SCHOOL DISTRICT OF INDIAN RIVER COUNTY

Finance
The provider was awarded the following grants for fiscal years (FY) 2021-22, 2022-23 and 2023-24:

FY 2021-22

Grants	Grant Number	Grant Amount	Unexpended
Adult Education - AGE	310-1912B-2CG01	$ 210,434.00	$ 41,611.85
Perkins Secondary	310-1612B-2CS01	$ 194,066.00	$ 12,363.20
Perkins Rural	310-1612B-2CR01	$ 25,000.00	$ 417.56

FY 2022-23

Grants	Grant Number	Grant Amount	Unexpended
Adult Education - AGE	310-1913C-3CG01	$ 247,434.00	$ 48,752.23
Perkins Secondary	310-1613B-3CS01	$ 194,066.00	$ 5,202.23
Perkins Rural	310-1613R-3CR01	$ 25,000.00	$ 5,646.43
Perkins Equipment Upgrade and Modernization	310-1613R-3C001	$ 212,980.00	$ 440.00
Pathways to Career Opportunities	310-90310-3S601	$ 113,845.00	*

FY 2023-24

Grants	Grant Number	Grant Amount	Unexpended
Adult Education - AGE	310-1914C-4CG01	$ 156,544.00	$ 47.08
Perkins Secondary	310-1614S-4CS01	$ 207,147.00	$ 7,818.42
Perkins Rural	310-1614P-4CP01	$ 25,000.00	$ 11,675.37

*Funds were never spent.

Additional information about the provider may be found at the following web address: https://www.indianriverschools.org/

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.

<u>Onsite Visits</u>
The monitoring team visited the following sites as part of the OSMR:
- SDIRC – Sebastian River High School
- Treasure Coast Technical College

<u>Entrance and Exit Conferences</u>
The entrance conference for SDIRC was conducted on November 5, 2024. The exit conference was conducted on November 8, 2024. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Christi Shields	Director of CTE & TCTC	X	X
Alison Moody	College & Career Specialist, SDIRC	X	
Kristine Blum	Program Specialist, Adult Education, TCTC	X	
Kristine Burr	CTE Program Specialist (retired), SDIRC	X	X
Division Monitoring Team			
Chuck Davis	Program Specialist, QAC	X	X
Michael Swift	Program Specialist, QAC	X	X

<u>Interviews</u>
No interviews were required as part of the OSMR. SDIRC submitted thorough and qualitative documentation and records via the Department ShareFile.

<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 SDIRC CTE and AE grants are managed by experienced program administrators and follow the same process for the drafting, approval and submissions of their grants to FDOE.
- The grant manager for SDIRC 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), SDIRC 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:
  - CareerSource Treasure Coast – Representatives of local workforce board
  - SDIRC administrators and faculty – Local secondary educational agency representatives

- o SDIRC Counselor and Disabilities Specialist – Special populations and individuals with disabilities.
  - o Multiple civic engagement organizations – Out-of-school youth, homeless children and youth at-risk
  - o Local business owners (private and public)
  - o Parents and students
- Workforce Advisory meetings are held throughout the school year with the above-mentioned stakeholders, as well as other participants who represent multiple entities within the county.
- While conducting their Labor Market Analysis (LMA), SDIRC also received multiple letters of support from their local CareerSource and other 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 and/or state occupation demands report.
- SDIRC conducts ongoing professional learning and training events 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. SDIRC provided multiple records of district-wide 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.

- SDIRC currently utilizes FOCUS® as their management information system (MIS) and student information system (SIS) to house and track AE and CTE student data such as records, grades and attendance.
- The district has policies and procedures on data collection and offers localized training to CTE and AE administrative staff and teachers via annual training workshops. Training provided by the district includes achieving data quality workshops, best practices seminars and other targeted training as deemed necessary. Administrative staff also attend FDOE sponsored training and professional development such as the Workforce Education and District Data Advisory Council (WEDDAC) annual conference.
- AE literacy completion points (LCP) are automated within the MIS, and monthly verification reports are sent to all program sites for verification. Additionally, bi-weekly edit reports are also provided to each site to be corrected before resubmission to the SIS.
- All proctors of the Tests for Adult Basic Education (TABE) and the Comprehensive Adult Student Assessment System (CASAS) are trained and certified, as required, by the state and the appropriate testing companies. Local policies and procedures on testing are also in place.
- All of the data elements required of their local MIS were included in the system and verified during the desk review.
- Student electronic files include "release of information" clauses as required by the Family Educational Rights and Privacy Act (FERPA).
- Samples of CTE and AE student data were reviewed and verified for accuracy as part of the OSMR. All student records were provided by SDIRC.
- Records reviewed included:
  - o AGE completers and non-completers
  - o CTE industry certifications (secondary & postsecondary)
- Upon review of the student data, it was determined that SDIRC was compliant in the submission of CTE student data; however, there was a concern that a student was identified incorrectly.

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

- All the CTE programs offered within the SDIRC incorporate project-based learning within their curriculum to meet standards. These projects include modifications and accommodations to help prepare special populations for high skill, high-wage or in-demand industry needs.
- The local workforce members, who are in non-traditional fields, are encouraged to participate in classroom activities and presentations to support any students in non-traditional CTE programs. In addition, the CTE Program Specialist speak to the students in order to ensure success within the non-traditional field.
- SDIRC has a memorandum of understanding (MOU) with CareerSource Treasure Coast 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.
- SDIRC offers students multiple opportunities to participate in additional learning activities outside of the traditional classroom environment.
  - Depending on the school site, the district offers Dual Enrollment (DE) programs to high school students. The DE students are co-enrolled with their Treasure Coast Technical College and encouraged to pursue further technical college coursework when they graduate high school.
  - Students have opportunities to earn articulated community college credit through earning industry certifications with Indian River State College.
  - Multiple clubs and student organizations are available for students to participate in program themed learning environments.

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.

- All inventory criteria set forth by federal, state and local guidelines are included within the district's fixed asset management system.
- SDIRC has policies and procedures on property management, equipment safety/storage, inventory reconciliation and inventory disposal. In addition to these policies and procedures, SDIRC 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 Property Office (PO).
- Capitalized equipment is inventoried at least annually, and all inventoried property must match the records maintained within the PO. Property Managers must notify the office of any property that is lost, believed to be stolen or missing.
- Any instances of theft, burglary or damage to equipment must be reported in a Damage and/or Loss of Property Report and submitted electronically to the PO within 72 hours of discovering the loss. A police report with the case number must also be attached to the report. The report will be submitted to the Board, who will then approve the item(s) for deletion from inventory.
- SDIRC reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
- Monitoring staff conducted inventory reviews at two SDIRC campuses and all inventory was accounted for and in its correct location. The district capitalized inventory monetary threshold

is $1,000. QAC staff verified inventory at the federal $5,000 threshold, as well as spot checked $1,000 items for internal controls compliance. No issues were uncovered.
- Annual training is provided to all district property managers to learn the duties, responsibilities and inventory reports required of their position.

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

- SDIRC 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
- AE student attendance records reflecting class drops
- Fiscal and operational policies and procedures
- CASAS certifications
- Multiple MOUs
- Dual enrollment articulation agreement
- Advisory committee meeting records
- Travel records
- GEPA statement
- Disability Services Manual
- CLNA documentation
- Professional learning calendar

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.

- Focus® is used as SDIRC's financial management system. Purchases, contracts, deliverables and all aspects of procurement are housed within the system.
- SDIRC has policies and procedures that provide a uniform and systematic method for procurements in an efficient, cost-effective manner in accordance with, and as permitted by, applicable federal and state laws; Department rules; School Board policies; and administrative rules, procedures and guidelines which promote transparency and accountability in the expenditure of federal and state funds The following components of the procedures manual were reviewed as part of the monitoring process:
  o Purchasing guidelines and procedures
  o Sole source purchases

- o Budget implementation
- o Cash Management
- o Contracts and bids
- o Purchasing cards (P-card)
- o Inventory Management
- o Procurement
- o Conflict of interests
- o Ethics
- o Travel
- 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.
- SDIRC does use grant-funded P-cards 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 SDIRC.
- 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 toward the operation of programs and fit within the scope of the grant.
- No purchases shall be authorized without prior approval from the Division via a grant award letter and/or subsequent amendment(s).
- SDIRC provided additional fiscal records such as:
  - o Time and effort
  - o Procurement
  - o Travel
  - o P-card transactions
- Monitoring staff conducted a budget analysis of SDIRC's Department grants. See Finding 1.

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.

- SDIRC has numerous collaborations, partnerships and MOUs throughout their service region. These partnerships aid in the expansion and implementation of the core objectives of SDIRC. The list of partners includes, but is not limited to:
  - o Indian River County Workforce Taskforce
  - o Indian River Manufacturing Committee
  - o Indian River State College

VIII. RESULTS

SDIRC was found to be out of compliance due to the following:

Finding Number	1
Area	Finance
Finding Summary	A grant budget analysis (GBA) was conducted for SDIRC for all grants from 2021-2024. There was an error in: Object codes were overspent with no budget amendments submitted.
Finding Detail	• FY 2021-22 • CTE-Secondary: Object codes were overspent with no budget amendments submitted.
Citation	Violation of the Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments. Along with 2 CFR 200.308, (b) (c) Revisions of the budget & program plan, and 2 CFR 200.407, not seeking prior approval before expending funds.
Recommended/Anticipated Corrective Action	The director will provide a letter of attestation and plan of corrective action
Anticipated completion date:	2/6/2025
Name and Title responsible for CAP	Christi Shields, Director CTE & AE, SDIRC
Plan Accepted by:	Chuck Davis
Status of Action Plan	Complete

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.

On behalf of the Division, the monitoring team would like to extend their appreciation to all participants in the School District of Indian River County monitoring review. A special thanks is offered to Ms. Christi Shields for her participation and leadership during this process.

School District of Indian River County
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Districts Receiving Career and Technical Education (CTE) Carl D. Perkins Grants

Agency Name: **School District of Indian River County**
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	5	X8	40
	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	7	X 6	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	5	X 4	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	3	X 4	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
			AGENCY RISK SCORE:		**220**

Data sources used for calculations: Prior to July 1, 2023

School District of Indian River County
Adult Education
Risk Matrix

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

Agency Name: **School District of Indian River County**
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	**5**	<u>X10</u>	**50**
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	**3**	<u>X 8</u>	**34**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	**1**	<u>X 8</u>	**8**
	3	5			
	2	3			
	1	1			
Change in Management Information Systems (MIS) from Previous Fiscal Year	Yes	7	**0**	<u>X 6</u>	**0**
	No	0			
Agency AE Program Director Change from Previous Fiscal Year	Yes	7	**0**	<u>X 6</u>	**0**
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	**3**	<u>X 4</u>	**12**
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	**3**	<u>X 4</u>	**12**
	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	**1**	<u>X 6</u>	**6**
	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	**122**

<u>Data sources used for calculations:</u> Prior to July 1, 2023

Please address inquiries regarding this report to:

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