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

Broward County Public Schools

September 20-24, 2021

Final Report

TABLE OF CONTENTS

<div align="center">
Florida Department of Education
Division of Career and Adult Education
Broward County Public Schools
Career and Technical Education and Adult Education
Quality Assurance and Compliance Monitoring Report
</div>

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 designing, developing, implementing, and evaluating a comprehensive quality assurance system, 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).

III.   QAC CORE MONITORING GUIDE

The Core Monitoring Guide (CMG) is intended to be used broadly by any reviewer conducting an onsite or desk monitoring of any program currently administered by the division. The guide provides a summary of each facet of the monitoring design and the process. It also contains objectives that may be used as agencies are monitored or reviewed. It is located on the division's website at
http://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 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 Broward County Public Schools (BCPS) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was initially sent to Mr. Robert Runcie, superintendent, on July 14, 2021. The current interim Superintendent is Dr. Vickie Cartwright. The designated representative for the agency was Mr. James "Jim" Payne. The division's representative conducting the VDMR was the program specialist, Michael Swift of the Quality Assurance and Compliance section.

V.   BROWARD COUNTY PUBLIC SCHOOLS

ENROLLMENT:
CTE (possible duplication at program level): Secondary – 81,208; Post-secondary – 19,064
AE – 15,080

Finance
The provider was awarded the following grants for fiscal year's (FY) 2018-19, 2019-2020 and 2020-21:

FY 2018-19

Grants	Grant Number	Grant Amount	Unexpended
Perkins DJJ	060-1619B-9CJJ1	$64,400	$151.15
Perkins Secondary	060-1619B-9CS01	$686,210	$10,533.50
Perkins Post-secondary	060-1619B-9CP01	$2,758,222	$30,034.86
Adult Education - IELCE	060-1939B-9CE01	$661,696	$32,384.13
Adult Education - AGE	060-1919B-9CG01	$2,226,354	$6,534.89

FY 2019-20

Grants	Grant Number	Grant Amount	Unexpended
Perkins DJJ	060-1610B-0CJJ1	$64,400	$35,175.20
Perkins Secondary	060-1610B-0CS01	$64,400	$151.15
Perkins Post-secondary	060-1610B-0CP01	$855,492	$16,905.88
Adult Education - IELCE	060-1930B-0CE01	$661,696	$25,211.32
Adult Education - AGE	060-1910B-0CG01	$2,226,354	$56,646.28

FY 2020-21

Grants	Grant Number	Grant Amount	Unexpended
Perkins Secondary	060-1611B-1CS01	$3,044,722	N/A
Perkins Post-secondary	060-1611B-1CP01	$793,317	N/A
CARES Act - Rapid Credentialing	060-1230A-1CR03	$1,089,335	N/A
CARES Act - CTE Infrastructure	060-1230A-1C002	$574,279	N/A
Adult Education - IELCE	060-1931B-1CE01	$661,696	N/A

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

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>
No onsite visits were made during the VDMR process.

<u>Entrance and Exit Conferences</u>
The virtual entrance conference for BCPS was conducted on September 20, 2021. The exit conference was conducted on September 24, 2021. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
James Payne	Director (Task Assigned) CTACE	X	X
Brian King	Curriculum Supervisor, CTACE	X	X
Christie Cerbone	Curriculum Supervisor, CTACE	X	X
Christy Bradford	Curriculum Supervisor, CTACE	X	X
Matthew Fritzius	Curriculum Supervisor, CTACE	X	X
Neeta Rancourt	Assistant Principal-Atlantic Technical College	X	X
Chris Bowers	Instructional Tech Support Atlantic Technical College	X	X
Ella Toney-Fullard	Budget Analyst VBudget	X	X
FDOE Monitoring Team			
Chuck Davis	Program Specialist, QAC, FDOE	X	X
Michael Swift	Program Specialist, QAC, FDOE	X	X
Orion Price	Program Specialist, QAC, FDOE	X	X

<u>Interviews</u>
BCPS administrators were available via teleconference for interviews, if necessary.

<u>Records Review</u>
Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, item F. A minimum of nineteen 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 BCPS CTE and AE grants are managed by two separate groups of administrators but follow the same process for the drafting, approval and submissions of their grants to FDOE.
  - o   The director of Career, Technical, Adult and Community Education (CTACE) is responsible for managing the district's secondary Perkins grants and their CARES Act grants. The CTACE director also works alongside the assistant director of Atlantic Technical College (ATC) to manage their post-secondary Perkins grants.

- o The AE curriculum supervisor serves as the grant manager of the district's AGE and Integrated English Literacy and Civics Education (IELCE) grants.
  - o The AE and CTE grant managers conduct annual needs assessments with program facilitators and teachers to ensure that all program needs are addressed within their respective grants.
  - o Once all of the programmatic needs are addressed and the grant applications are complete, the district grants department verifies the contents of the grants before moving it along to the superintendent for final approval prior to submission to the state.
- Despite being managed by different administrative staff, the CTE and AE programs operate as a cohesive unit. Both sets of grant managers are housed at ATC and have regular meetings to ensure that both program areas are operating in the best interest of students.
- As part of the required comprehensive local needs assessment (CLNA), CTE administrative staff consulted with numerous individuals and entities across the district's service area. Those stakeholders included but were not limited to; students; teachers; CareerSource Broward; the Broward Chamber of Commerce; and multiple local business and community leaders. All secondary and post-secondary CTE programs have advisory councils that meet several times a year, and they provided invaluable input and advice throughout the CLNA process. The majority of these stakeholders who participated in the CLNA process are expected to serve as ongoing consultants to the CTE program.
- Prior to the mandated CLNA (CTE only) the AE and CTE programs conduct district-wide, annual program reviews to determine district needs. BCPS also benefitt from their strong relationship with local civic and business leaders who would oftentimes offer input as to what professions, occupations and trainings were needed in the community.
- The district took the aforementioned program review process and expanded on it to fit the terms and guidelines of the CLNA.

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.

- BCPS utilizes FOCUS® as their integrated Student Information System (SIS) and Workforce Development Information System (WDIS).
- The district has policies and procedures on data collection and offers annual localized training to CTE and AE administrative staff and teachers. Training provided by the district includes but is not limited to: the annual Summer Workforce Education Leadership training; the annual Back-to-School teacher trainings; and the National Reporting System (NRS) new user trainings. Administrative staff also attends FDOE sponsored training and professional development events such as FDOE quarterly webinars, the Florida Association of Career and Technical Education (FACTE) conference and Workforce Education and District Data Advisory Council (WEDDAC) annual conferences.
- BCPS has a robust checks and balances system to ensure the accuracy of all student data submitted to the state. Each program site (school) has an Information Management Specialist (IMS) that is responsible for verifying all student data from their particular school prior to submission to the district WDIS data entry operator. Data staff then reviews all records from across the district for accuracy prior to submission to FDOE. If the district receives any edit/error reports from the state, the data staff and school IMS is responsible for reconciling that data prior to re-submission to FDOE.
- Additionally, AE literacy completion points (LCP) are reviewed manually prior to submission to FDOE. Although FOCUS® is capable of auto-detecting LCPs, each teacher is responsible for manually noting the LCP gain. The IMS at each school then confirms and approves the gain before uploading to the WDIS and submission to FDOE.

- The WDIS employs numerous safeguards that prevent erroneous data from being uploaded into the system. Fields that are required to be populated must include the appropriate data element(s) or the system will not let the data entry operator proceed to the next field.
- BCPS conducts internal data compliance audits of their schools on a regular basis. Student data is selected at random and reviewed for compliance and adherence to local and state policies and procedures.
- Once district-wide data reports are available the information is distributed to stakeholders, program directors, principals and program managers for review. These reports help the AE and CTE programs assess their strengths, weaknesses and areas for improvement of their programs.
- 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 VDMR. No errors were found. All student records were provided by BCPS.

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

- BCPS offers CTE and AE programs across three technical colleges, three adult centers, all high schools, most middle schools and 16 satellite sites throughout Broward County.
- BCPS prides itself in making CTE and AE programming available for all students who wish to participate. CTE programs are available across the county, but with some programs only offered at specific locations, and AE services are provided at various times and locations to accommodate the many needs of their adult learners.
- Prior to the Perkins required CLNA, the district already conducted CTE program viability reviews driven by workforce needs, workforce data, student enrollment numbers and prior years' student data. Notably, decisions that came from previous program reviews were upheld and confirmed by the results of their CLNA.
- During the height of the COVID-19 pandemic, the district was forced to adjust how they offered instruction to students. Fortunately, the district was still able to maintain approximately 90% of their pre-pandemic CTE enrolled students. The AE program experienced a more significant dip in enrollment, but online learning services such as the CANVAS® platform allowed AE students the ability to continue virtual learning until those classrooms opened back up. The district also plans to continue virtual learning, even as students returned to the classroom following the COVID-19 pandemic.
- Due to the "hands on" nature of CTE programs, the district was able to welcome post-secondary students back into the classroom as early as June of 2020. Secondary students returned to the classroom at the beginning of the 2021-22 program year.
- BCPS sponsors programs that aim to attract, retain and support students on all levels.
  o The Broward High School Exploration program and the Career Exploration program aim to introduce students to all aspects of CTE and workforce opportunities as early as middle school.
  o The Out of School Youth grant aims to get students back into the classroom to earn their General Education Development (GED) and become job ready.
  o BCPS invests multiple resources in ensuring that their academic alternative schools receive the same guidance and opportunities as their traditional school sites.

- o The Exceptional Students Learning Services department works with K-12, post-secondary and AE students to ensure that all of their needs are being met, and that they are afforded equal access in all learning environments (when possible).
- BCPS offers students multiple opportunities to participate in additional learning activities outside of the classroom.
  - o Work based learning, internships and on-the-job training (OJT) is a priority within the district.
  - o Students participate in multiple Career and Technical Student Organizations (CTSOs).
  - o Multiple dual enrollment agreements are in place with local colleges that allow qualified high school CTE students to earn post-secondary college credits.
  - o IELCE students are able to participate in Integrated Education and Training (IET) programs that better prepare them for transition into the workforce and/or into a post-secondary CTE program.
- AE and CTE instructors participate in ongoing training provided by FDOE, as well as annual professional development through the district. Program specific trainings are also attended as required.
- No reasonable services and accommodations are denied to those students who self-declare a disability. The district works with disabled students to ensure their individual needs are being met.

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 inventory management system. The inventory management system was verified during the VDMR.
- The district has a technology plan that includes policies on new equipment requests, equipment safety/storage, and old inventory disposal.
- Program site leaders (principal and/or program director) act as the custodians of all equipment housed at their location.
- BCPS conducts an annual district-wide inventory of their federally funded equipment, and there have been no reports of stolen or lost equipment over the previous three fiscal years.

E. **ACCESS AND EQUITY** refer to compliance with federal non-discrimination laws' requirements 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 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.

- Size, scope and quality review
- CLNA –Local Market Alignment
- MIS data quality checklists
- District policies and procedures for finance and procurement
- District technology plan
- WDIS user guide
- Student and employee handbooks
- Inventory and 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 and AE student data review
- Tests of Adult Basic Education (TABE) and Comprehensive Adult Student Assessment System (CASAS) proctor records

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.

- SAP® is used as the district's Enterprise Resource Planning (ERP) system.
- The district's Accounting and Finance Procedures Guide ensures the efficient management of CTE and AE grant funds.
    - Financial reporting
    - Internal Controls
    - Audit requirements
    - Training
- Purchase orders are only created and authorized for items previously approved in the FDOE federal grant application. Once a purchase has been authorized, the method of procurement is determined based off the price of the item(s). All purchases in excess of $50,000 must be approved by the BCPS board. All items below that threshold may be approved by the grant manager(s).
- Grant managers work closely with the district grants department to ensure all expenditures are allowable by law, and able to be funded with federal 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 FDOE if the opportunity arises.
- The district has a preferred deadline to submit all grant amendments to the superintendent for approval prior to submission to the state. That deadline is early spring of the current fiscal year.

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.

- BCPS 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:
    - CareerSource Broward
    - Atlantic Technical College
    - Embry Riddle
    - Broward Technical College
    - University of Miami
    - Walgreens
    - Regents Park of Boca Raton
    - Memorial Healthcare
    - Florida Training Services, Inc.
    - Masonry Association of Florida
    - South Florida Manufacturers Association

VIII.   RESULTS

BCPS was not found to be out of compliance. All items reviewed were compliant in accordance to applicable local, state and federal laws and/or policies and procedures.

IX.   SUMMARY

Once the monitoring review 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 corrective action plan items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

The monitoring team extends its appreciation to all participants of the Broward County Public Schools monitoring review on behalf of the department. Special thanks is offered to Mr. James "Jim" Payne for his participation and leadership during this process.

APPENDIX A

Broward County Public Schools
Career and Technical Education
Risk Matrix

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

Agency Name: **Broward County Public Schools**
Program Type: **CTE**
Monitoring Year: **2021-2022**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
Number of Years Since Last Monitored	7 or More Years	7	3	X 10	30
	5-6	5			
	3-4	3			
	0-2	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	7	X8	56
	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	7	X 4	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	X 4	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
			AGENCY RISK SCORE:		**182**

Data sources used for calculations: Prior to July 1, 2020

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

Agency Name: **Broward County Public Schools**
Program Type: **AE**
Monitoring Year: **2021-2022**

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	7	X 8	56
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4 or More	7	3	X 8	24
	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	7	X 6	42
	No	0			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	7	X 4	28
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
Number of Findings from the Office of the Auditor General	Upper Quartile	7	7	X 4	28
	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	232

Data sources used for calculations: Prior to July 1, 2020

Please address inquiries regarding this report to:

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