

Farmworker Career Development Program

Monitoring Policies, Procedures, and Protocols



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Florida Department of Education
Division of Career and Adult Education

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INTRODUCTION

FCDP providers will be monitored on an annual basis per US Department of Labor guidance. The Florida Department of Education, Division of Career and Adult Education (Division), Quality Assurance and Compliance Section, in concert with the Farmworker Career Development Program (FCDP) Section, has developed Monitoring Policies, Procedures, and Protocols to implement this requirement. Programs and services will be monitored to support the operation of the United States Department of Labor (USDOL), Workforce Innovation and Opportunity Act (WIOA) Title I, Section 167 grant, Migrant and Seasonal Farmworkers. The primary purpose of this system is to ensure that the FCDP's goals and standards are met.

SECTION 1 – GENERAL PROVISIONS

PURPOSE OF MONITORING

The purpose of monitoring is to identify the specific areas in which a provider is in compliance or non-compliance with Federal law and regulations, state statutes and rules, the Office of Management and Budget (OMB) circulars, and/or conditions of the grant(s). The timely identification of non-compliance provides a framework to make changes that are expected to result in programs becoming more efficient and effective. In addition, a comprehensive and multi-dimensional Quality Assurance System is a foundation for continuous improvement of services and systems both internally and externally. The Department's commitment to excellence supports accountability, collaboration, targeted technical assistance, continuous improvement, and positive systemic change. Monitoring protocols will address performance and compliance.

A WAY OF WORK

The Florida Department of Education (FLDOE), Division of Career and Adult Education, 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 section is responsible for the design, development, and evaluation of a comprehensive system of quality assurance including monitoring. The Farmworker Career Development Program Section in Tampa will implement the monitoring system as it relates to Migrant and Seasonal Farmworker sub-grantees. The role of the Monitoring System is to assure financial accountability, program performance and quality, and regulatory compliance. As stewards of Federal and state funds, and in accordance with USDOL guidance, it is incumbent upon the Division to perform on-site regulatory compliance monitoring of all direct service providers using WIOA Title I, Section 167, grant funds on a regular basis.

The monitoring component of the system is risk-based and performance targeted. Risk Assessment is a process used to evaluate variables associated with the grants, especially performance, and assign ratings to these variables which will be used to compile an overall assessment of the provider's level of risk to the Florida Department of Education and the Division. A Risk Assessment Matrix may be completed for each provider prior to the completion of the federal funding award and used to adjust funding amounts or utilize methods of payment which will minimize the overall fiscal risk to the Department. But, in all cases, the Risk Assessment Matrix will be used to target review areas for the on-site monitoring team.

AUTHORITY

The authorizing legislation for federal support of Migrant and Seasonal Farmworkers is found under Title I, Section 167, of the Workforce Innovation and Opportunity Act: <http://www.doleta.gov/wioa/>. The Florida Department of Education receives Federal funding from USDOL's Employment Training Administration (ETA) for the Farmworker

Career Development Program. FLDOE awards sub-grants to eligible providers to administer local programs. FLDOE must monitor providers to ensure compliance with Federal requirements, including Florida's approved Program Plan for Migrant and Seasonal Farmworker Programs as specified in WIOA, Section 167.

Federal regulations that apply to the programs funded under WIOA, Section 167, until superseded, include:

- a. 20 CFR part 669;
- b. The general administrative requirements found at 20 CFR, part 667, including the regulations concerning Complaints, Investigations and Hearings found at subpart E through subpart H, which cover programs under WIA section 167;
- c. The regulations codifying the common rules implementing Office of Management and Budget (OMB) Circulars, which generally apply to Federal programs carried out by State and local governments and nonprofit organizations at 29 CFR parts 95, 96, 97, and 99, as applicable.

Final Guidance has been issued that, upon implementation, will supersede requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in 2 C.F.R. Parts 220, 225, 215, and 230); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up. See [final guidance](#) and [OMB Policy Statements](#) for more information on Uniform Grant Guidance (UGG).

UGG Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards § 200.100 Purpose, denotes uniform nature of standards and requirements for all Federal grants and cooperative agreements irrespective of entity type; removes explicit reference to Institutions of Higher Education (IHEs), hospitals, and other non-profit organizations.

§ 200.101 Applicability, Adds explicit reference to Indian Self-Determination and Education Assistance Act of (ISDEAA) as amended, 25USC 450-458 ddd-2, for tribal entities.

Education Department General Administrative Regulations (EDGAR) Part 76 State Administered Programs. EDGAR 34 CFR part 76.1 “Programs to part 76 applies to each State-administered program of the Department. Pursuant to EDGAR 34 CFR 76.770, “A State shall have procedures to ensure compliance. 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.”

UGG § 200.51 Grant Agreement – Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments § 200.51 establishes uniform administrative rules for federal grants and cooperative agreements and sub awards to State, local and Indian tribal agreements.

UGG § 200.328 “Monitoring and reporting program performance, (a) Monitoring by providers. Providers are responsible for managing the day-to-day operations of grant and subgrant supported activities. Providers must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Provider monitoring must cover such program, function or activity.”

§215.86, Florida Statutes (F.S.), “Management System and Controls — Each state agency and the judicial branch as defined in §216.011, F.S., shall establish and maintain management systems and controls that promote and encourage compliance; economic, efficient, and effective operations; reliability of records and reports; and safeguarding of assets. Accounting systems and procedures shall be designed to fulfill the requirements of generally accepted accounting principles.”

§1008.32, F.S., address the responsibility of the State Board of Education for oversight and enforcement relative to compliance. Title VI of the Civil Rights Act of 1964 [PL. 88-352]; Title IX of the Education Amendments of 1972 as amended [20 U.S.C. 1681-1683 and 1685-1686]; Section 504 of the Rehabilitative Act of 1973, as amended [29 U.S.C. 794]; Section 1000.05, Florida Statutes: “The Florida Educational Equity Act”; Section 760.10, Florida Statutes: “Unlawful Employment Practices” Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act of 1990, Age Discrimination in Employment Act of 1967 and the Age Discrimination Act of 1972.

The Genetic Information Nondiscrimination Act (GINA) of 2008 prohibits discrimination on the basis of genetic information. Civil right compliance obligations are monitored by the following:

Secondary and technical education centers operated by public school districts. The Office of Equal Educational Opportunity (OEEO); contact phone number: 850-245-9556. Postsecondary public education institutions: Equity and Civil Rights Compliance, Division of Florida Colleges; contact phone number: 850-245-9468. Should you have any questions or concerns, please contact the OEEO at 850-245-9556, or the OECC at 850-245-9468.

The Project Application and Amendment Procedures for Federal and State Programs (Green Book at <http://www.fldoe.org/grants/greenbook/>).

Financial and Program Cost Accounting and Reporting for Florida Schools (Red Book at <http://www.fldoe.org/finance/fl-edu-finance-program-fefp/>).

Uniform Administrative Requirements, Cost Principles and Audit Requirement for Federal Awards (2CFR Part 200 at http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpludit-requirements-for-federal-awards).

UGG Part 200, § 200.328 and § 200.331 Monitoring and reporting program performance. The non-Federal entity is responsible for oversight of the operations of Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring also must cover each program function or activity.

STRATEGIC IMPERATIVE

The FDOE operates within the following guiding principles: a coordinated K-20 seamless system, student-centered, access, equity, academic excellence, and flexibility. Strategic focus areas within Florida's Next Generation PreK-20 Education Strategic Plan have also been developed to assist the Department in long range planning efforts. The Division of Career and Adult Education specifically addresses the following strategic focus areas:

1. Expand opportunities for postsecondary degrees and certificates.
2. Improve College and Career Readiness.

OPERATIONAL STANDARDS - ROLES AND RESPONSIBILITIES

Office of Management and Budget (OMB) guidance requires that the FDOE, Division of Career and Adult Education, monitor the activities of sub-grantees or providers, to ensure the performance goals are achieved and Federal funds are expended for authorized purposes. Monitoring will support compliance with Federal laws and regulations, state statutes and rules, and the provisions of an approved grant award.

Designated staff is expected to coordinate and complete compliance monitoring in accordance with the system requirements. Staff is required to render impartial and unbiased judgments in the review of provider compliance with the terms and conditions specified in the approved grant award, as well as, applicable state and Federal laws.

Staff is expected to demonstrate, model, and reinforce the values of integrity, accountability, quality, urgency, responsiveness, personal responsibility, courtesy, collaboration, and innovation. Staff will demonstrate these values at all times in their interactions with co-workers, supervisors, providers and other stakeholders; in their personal contributions for work assignments and projects; and when representing the Division and the Florida Department of Education.

SECTION 2 - IMPLEMENTATION FUNDAMENTALS

The purpose of this section is to identify essential fundamentals of the implementation of the Quality Assurance System and specific components of monitoring activity for the Farmworker Career Development Program.

GENERAL PROCEDURES

Each section of this manual has been developed to provide consistency and order to the application of the Monitoring activities as they are developed. For each component, certain elements may be present.

Regulatory Authority: Protocols will be substantiated with the regulatory citation as appropriate.

Protocols: In order to substantiate compliance vs. non-compliance, protocols are developed to ensure consistent application of regulatory requirements. For example, the use of interview protocols, record review checklists or observation guidelines will support clear expectations and findings of fact. Forms and checklists are developed to ensure efficient monitoring processes.

Consistent Use of Terms: The sub-grantee or vendor will be referred to as the provider or agency in the contents of the monitoring papers. Other terms will be defined in applicable laws and regulations; excerpts are included in this document.

STAKEHOLDER INVOLVEMENT

The Division of Career and Adult Education is committed to the inclusion of stakeholder involvement in the Quality Assurance System. Participation of school districts, community colleges, state colleges and universities, community/faith-based organizations, students and families and division staff ensures a dynamic and transparent system. As the Quality Assurance System is developed and implemented, it will evolve based upon the input of stakeholders, in addition to implementation activities. The Advisory Council acts in an advisory capacity to ensure stakeholder participation in the quality assurance process; there is no approval authority. Final authority for decision-making lies with the division.

Quality Assurance Advisory Council: The Advisory Council may convene, in person or by phone, to review and give feedback regarding the Quality Assurance processes and tools. This workgroup may also assist in the review of data and trends to ensure meaningful development and revision of the system to identify the need for statewide systemic technical assistance activities, and assist in the evaluation of the system.

Focus Groups: Representatives associated with the grant awards as a provider, student or family member, may be solicited from across the state to participate in periodic focus groups during the year. The focus groups may give input regarding a single issue/topic. Groups may be contacted for phone or video conferences, individual calls, emails, or written surveys. Focus groups may also be organized to meet during onsite visits.

Peer Monitors: Peer monitors can be an invaluable asset to the quality assurance process, especially monitoring. Persons from the field are nominated to participate in the monitoring process and bring a wealth of training and expertise to their assignment. Peer monitors may be used across disciplines and can be a key tool in times of shrinking resources. Qualified persons from local providers, FDOE, and/or outside agencies may be recruited to participate in the monitoring processes with the FDOE monitoring team. Use of peer monitors will increase monitoring resources, provide training on the monitoring process, and support an effective and efficient system. The division may implement a peer monitoring system.

PROFESSIONAL DEVELOPMENT

In order to ensure the consistent interpretation and application of the components of the Monitoring System, it is appropriate to provide training to internal and external customers.

Training will be provided to internal FCDP State Office staff by the Division's Compliance Office and be consistent with the Division's monitoring and compliance protocols. Providers will receive training via conference calls regarding the monitoring activities and procedures specific to the visit, as well as, during presentations at the program's annual conferences.

In addition, Bi-monthly webinars are scheduled for all grantees in order to provide program updates, review compliance issues, and performance status.

DATA REVIEW

The level of compliance and performance of services delivered by each provider requires continuous monitoring. Data are a key accountability tool used to measure past and present performance. The review of data is an integral part of the activities which will support the monitoring strategy for service providers. Following are some of the data sources that may be used to assess provider's performance:

- Grant Application including Assurances
- Project Disbursement Report (DOE 599)
- Project Amendment Request(s)
- Auditor General Audit Reports
- Community-Based Organizations' (CBO) Audit Reports
- Florida Education Training and Placement Information Program (FETPIP)
- CBO data system
- Customer Record Database including Performance Reports

SECTION 3 – RISK ASSESSMENT

Risk Assessment is a process used to evaluate variables associated with the grants which assigns a rating for the level of risk to the Florida Department of Education and the Division of Career and Adult Education. A Risk Matrix, identifying certain operational risk factors, is completed for each provider. Various sources of data are used throughout the implementation of the monitoring system. The results of the Risk Assessment process and consideration of resources at risk are used to determine appropriate monitoring strategies to be implemented. Agencies may be required to complete a self-assessment and/or be subject to a desk review at any time.

Potential Risk Factors

The risk assessment is based on an evaluation of certain risk factors related to the grants. The identification of risk factors takes into account the accessibility, availability, and relevance of the required data. The following are examples of risk factors that may be used:

1. Volume of Federal funds

- Greater funding may entail greater risk.
- The allocation of 1 million dollars carries significantly more risk than one thousand dollars.

2. History of audit findings

- The number of findings from three prior audits; negative findings indicate increased risk, repeated or uncorrected findings even greater risk.

3. Budget Management

- Repeated incidences of reported expenditures beyond approved budget line items, errors in the submission of budget amendments, or an excessive number of budget amendments may indicate a higher fiscal risk.

4. Organizational Changes

- A change in director during recent two years may affect coordination and implementation of the grant.
- A seasoned director presents less risk than one who is new to the responsibilities of the position.

5. Performance

- An agency that is not meeting the planned performance goals may have additional issues that need to be addressed.

6. Data Accuracy

- Data Validation accuracy – accuracy of specific data elements in participant master records as compared to same data elements for that participant in the customer record database.
- Customer Record Database accuracy – accuracy of data entered into database per master file layout edit requirements for specific data elements in each record.

The final risk assessment factors will be determined prior to the initiation of onsite monitoring for the program year.

Risk Matrix

The risk assessment tool, the Risk Matrix, uses predetermined risk factors (as discussed above) to rank the risk of FCDP grantees and identify targeted monitoring areas.

- specific risk factors are identified on the Risk Matrix;
- a scale of specific criteria is established;
- a value is assigned for each of the criteria;
- the value is multiplied by the risk factor weight;
- results in a total number of points for the specific risk factor; and
- the points for each risk factor are totaled for a level of risk score for the agency.

The higher score indicates a greater level of risk. The FCDP state office will review specific risk factors, criteria scale, values, and risk factor weights annually and make appropriate changes as needed.

SECTION 4 – MONITORING STRATEGIES AND PROCESSES

STRATEGIES

The review of the Risk Assessment process will be ongoing. But, the use of the Risk Assessment process does not limit the Division's ability to monitor any agency, grant award, or other contracts at any time. The Division may apply any specific monitoring strategy to any Federal- or state-funded provider at any time. There may be circumstances which may warrant additional onsite visits or other strategies, regardless of a provider's risk matrix score. Unannounced visits may occur if determined appropriate by the Chancellor of the Division.

A robust monitoring system includes various monitoring strategies. The following activities may be used as monitoring strategies with a provider at any time during the monitoring process. The intensity, frequency, and purpose of use may vary according to the monitoring strategy required by the agency. Various monitoring strategies may be utilized to ensure a comprehensive Monitoring System. The Division is not limited to apply a specific strategy to any provider at any time. Strategies include:

Phone calls and E-mail - Communication occurs with an agency to engage in monitoring activities, including targeted technical assistance or as a periodic reporting mechanism, through one or more phone calls, including conference calls or Email.

Video Conference - Various technology may be used to conduct a video conference to complete monitoring activities including, but not limited to pre- and post-visit communication with the agency, interviews, targeted technical assistance, and follow-up activities.

Self-Assessment - An agency completes a full or partial Self-Assessment according to a timeline determined by

the Program's Director to identify areas of greatest need/non-compliance; provide the results to the Division; and, if necessary, develop a corrective action/system improvement plan to ensure full compliance.

Records Review - Specific records and documentation are identified and requested to be submitted for a compliance review onsite or offsite in a desk review. Selected records may include, but are not limited to, invoices, purchase orders, travel documents, equipment lists, personnel records, student records and data, and existing policies and procedures.

Technical Assistance - Division staff or other designated parties provide a set of services that will assist providers with program and fiscal accountability, program quality and management, policies and procedures, or operations.

Corrective Action Plans (CAPs)/Action Plans/Program Improvement Plans - Activities/strategies are developed by the provider or the Division to achieve systems improvement or compliance.

On-site Visit - Monitoring activities are conducted onsite that may include the following: records review, observations, interviews, or other activities to perform a comprehensive review of compliance and program performance.

Verification - Activities used to insure the accuracy and consistency of the agency's performance, documentation, policies and procedures or data. Verification activities may take place onsite or offsite.

Referral for Fiscal or Data Review - A selected agency with non-compliance item(s) related to fiscal matters may be referred to the Department of Education Grants Management or Comptroller's Office for further review or action. Data issues may be referred for a data quality review within the FLDOE.

Desk Review - An agency's programs and services are monitored by various strategies including, but not limited to: a review of the agency's grant implementation and supporting documentation, requested records, and phone interviews.

Close-out Reports - A Close-out Report is required for all providers with grant awards that are no longer in place for any reason including termination, non-renewal, or selection. The report has specific requirements which must be completed at the direction of the Director. The US DOL has specific guidelines for close-outs of grants.

MONITORING PROCESSES

Major Activities

The following activities may be included as part of the monitoring process:

- Communication and Notification
- Interviews
- Observations
- Records reviews
- Data verification
- Desk-top reviews
- Self-Assessment
- Participant case studies
- Surveys
- Reporting
- Targeted technical assistance
- Corrective Action/Improvement Plans/Action Plans
- Verification and Closure

COMMUNICATION

In order to ensure consistent communication between the FCDP Monitoring Team and the individual provider, guidelines for the communication process are established. By designating specific coordinating personnel for each party and by setting timelines, each party will be informed of the expectations for completing the specific

tasks required to implement the monitoring processes effectively. Requests for information from the provider should be responded to within 10 business days. The initial notification letter and final report will be addressed to the Provider's Agency Head. All remaining written communications will be directed to the Provider's designated contact person(s). Although reference is made to communication regarding onsite visits, similar activities may be incorporated into the offsite monitoring strategies. Any exceptions or issues that arise from a monitoring strategy should be addressed with the FCDP Director (Director). The Division's Director of Quality Assurance and Compliance may be consulted at any time.

Notification - Providers may be notified of a pending monitoring activity by a phone call from the Director within a reasonable time of a scheduled activity. This call will be followed by written notification to the Agency Head. Additional phone calls will be held to coordinate the activity and ensure that the provider is informed of the monitoring components. Electronic mail is considered written notification when used.

Designation of Provider Contact - The provider is requested to designate a person to act as the primary contact for all monitoring functions.

Designation of FCDP Monitoring Contact - The Director is the team leader for all monitoring functions, including onsite visits. A co-leader is designated to coordinate the processes specific to a provider or group of providers. The co-leader reports to the Director.

Monitoring Team - The Monitoring Team is the designated person(s) to complete the monitoring processes.

Length of Monitoring Activity - The length of the visit may be determined by several factors including the size of the grant to be monitored, number of participants, the location(s) of the program(s), the complexity of the systems or documentation, as well as available resources.

Communication Prior to Onsite Monitoring - Prior to a monitoring activity the designated site team leader will conduct a phone interview with the provider-designated contact person. The team leader will identify persons involved with the activity with the provider. The provider will have the opportunity to clarify any issues concerning the data used as a basis for determining the site selection. Finally, the agency will be asked to provide any other information regarding its programs, procedures, or geographic area that may influence activities during monitoring process. Additional documents may need to be forwarded to the State Program Office prior to the activity. Training will be provided to targeted providers regarding the monitoring policies, procedures, and protocols.

Entrance Conference - The Monitoring Team conducts an entrance conference with the provider's official representative(s). The agency may provide an overview of its programs, services and systems which operate with the grant funds. The monitoring team describes the activities that will take place. The team leader may request those records covering the monitoring period up to and including the current records and documentation. Individual and/or group interviews, when used, may be set up in advance; however, during the course of the visit any agency personnel may be requested to participate in an interview. The provider is expected to make every effort to ensure that persons to be interviewed are available. The entrance conference provides an opportunity for both parties to review the schedule and work out any logistics that may contribute to an efficient and effective visit.

Daily Debriefing - The Monitoring Team leader may provide a debriefing to the provider's designated representative at the end of each day of monitoring. The team leader will discuss any issues or concerns found during the monitoring activities and address any provider concerns. This debriefing also enables the provider to locate any additional documentation that may be necessary to substantiate compliance.

Exit Conference - Upon the conclusion of the monitoring activity an exit conference is held. In attendance are member(s) of the Monitoring Team and the provider's designated representative. The provider may invite other persons as appropriate. The purpose of the meeting is to exchange information about the provider's strengths and concerns and to report on the general results of the monitoring visit. The exit conference allows the persons present an opportunity to review and discuss any issues addressed during the course of the monitoring activity. Conference calls may be used to facilitate an exit conference. Requests for additional time to submit documentation following the exit conference must be approved by the Director.

Follow-up Activities - The Monitoring Staff is required to work with the provider to ensure that the Resolution Plan is comprehensive, timely, and completed. Onsite visits or further requests for documentation may be implemented

to insure full compliance. Monthly documentation of follow-up activities is required of the team's co-leader and will be reviewed periodically by the Director.

SECTION 5 - RESOLUTION ACTIVITIES

Purpose: Resolution activities identify those specific steps/strategies to be taken by the provider that will address and resolve non-compliance, systemic issues, concerns, and/or the lack of achievement with performance indicators.

CORRECTIVE ACTION PLAN

Once a monitoring strategy is conducted, items of non-compliance are identified. In order to ensure the correction of those items, a Corrective Action Plan is developed. The Corrective Action Plan must identify the finding and the specific activities the provider will implement to ensure corrective actions have been completed to achieve full compliance. Dates of completion are expected. All strategies are expected to be completed within 30 days of the date of the final report. Extensions must be approved by the Director. The Monitoring staff is required to work with the provider to ensure that the Plan is comprehensive, timely, and completed. All Corrective Action Plans must be approved by the Director. Failure to develop or implement approved resolution plans may be addressed through additional monitoring activities and/or enforcement activities.

ACTION PLAN

Within the results of the monitoring activity, concerns may be noted. Concerns focus on areas that may need to be addressed to increase quality and minimize the potential for future findings. Such concerns are listed in the Action Plan; providers are required to address the concerns noted. All strategies are expected to be completed within 30 days of the date of the final report. Extensions must be approved by the Director. The Monitoring staff is required to work with the provider to ensure that the Plan is comprehensive, timely, and completed. All Action Plans must be approved by the Director. Failure to develop or implement approved resolution plans may be addressed through additional monitoring activities and/or enforcement activities.

SYSTEM/PROGRAM IMPROVEMENT PLAN

When a provider is unable to meet the projected level of performance on specific measures, a Program Improvement Plan may be required. The purpose of the plan is to target specific performance measures for improvement. Monitoring staff may work in concert with other Division staff to ensure consistency with the requirements, review, approval and follow-up of Program Improvement Plans.

Components of Plans

One form is used for all plans. The following components shall be included in each plan:

- A statement of the finding/data/concern
- Strategies - Action(s) taken by the provider to address the finding/data/concern and ensure full resolution
- Person(s) responsible for implementation of the strategies
- Projected date of completion, if warranted
- Technical assistance needed or provided

TARGETED TECHNICAL ASSISTANCE

Non-Compliance - As areas of non-compliance are identified locally or across the state, targeted technical assistance may be provided to support full compliance and systemic change for program improvement.

Areas of Identified Need - Targeted technical assistance addresses specific areas of identified need for an individual provider, a group of providers, or statewide, based on the frequency of the identified need. This need may be identified through federal or state reviews and/or audits that demonstrate repeated issues of non-compliance thus, the need for systemic change. For example, targeted technical assistance may be provided statewide as a result of a monitoring finding to ensure that the resolution is consistently and adequately interpreted

and addressed. Targeted technical assistance may be provided by the Monitoring Team, other Division or FLDOE staff, or through other sources outside the department.

Use of Technology - A myriad of delivery modalities are appropriate, including, but not limited to: telephone calls, e-mails, conference calls, Power Point presentations, and technical assistance papers.

SECTION 5 – ENFORCEMENT AND EVALUATION

Purpose: The purpose of Enforcement is to ensure the implementation of the elements associated with the Monitoring System for the Division of Career and Adult Education. Enforcement activities are in place to ensure that grants and contracts are implemented in a timely and ethical manner, in full compliance with regulatory requirements, to support the purpose and goals of the grant.

ENFORCEMENT ACTIVITIES

- Communication with Agency Heads and/or Governing Boards: Communication with governing Boards may be required to focus on the need for immediate and systemic change to continue eligibility for grant.
- Regular Monitoring/Reporting: For a specific period of time, the provider's activities will be monitored on a regular basis; provider may be required to submit regular and frequent reports.
- Grant Conditions: Restriction(s) placed on a specific grant as a result of monitoring activities; conditions may include such actions as directed activities, structured spending, and increased reporting.
- Funding Strategies: Actions taken in regard to the selected provider's funding; may include a range of interventions from directed funding, change in method of reimbursement or, to delay or withhold funds.
- State Plans: The State Plans may address additional enforcement activities.
- General Assurances, Terms, and Conditions for Participation in Federal and State Programs: This document that must be signed by all agencies and organizations that receive Federal or state funds may address enforcement activities.

INVESTIGATIONS

In response to expressed concerns or complaints, investigations may be conducted in regard to grant(s) administration or implementation by providers. Investigations take place at the Division level unless approved otherwise. Such activities will be completed in concert with, and reported to, other Department offices as appropriate.

CLOSE-OUTS

Providers will be required to submit final reports upon the conclusion or termination of a grant. The Close-out Review Process may address performance and financial reports, inventory and disposition of equipment, record retention and/or additional elements requested by the FDOE or the Department of Labor.

EVALUATION SYSTEM

The purpose of an Evaluation System is to review the components and implementation of the Monitoring System, including monitoring activities.

To support continuous improvement, the Monitoring Team will review any input that is given by stakeholders and providers monitored to make adjustments or changes to the system. As strategies and protocols are used, the team may identify changes that will improve the system. The system will be evaluated and revised as needed on an annual basis.

As the Monitoring System is expanded over time, the processes and procedures used internally to administer grants and programs will be evaluated. Various tools may be used including such evaluation tools accessible through federal agencies.

Florida Farmworker Career Development Program

On-Site Program and Fiscal Monitoring Checklist

OPEN ITEMS	
<p>Open follow-up items reviewed from:</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Pre-visit meetings <input type="checkbox"/> b. Prior Monitoring Findings, Concerns, Observations, or Recommendations <input type="checkbox"/> c. Data Validation process <input type="checkbox"/> d. Communication related to issues/concerns. 	
STRATEGIC PLANNING	
1.	<ul style="list-style-type: none"> <input type="checkbox"/> a. Site works with local Workforce Board. <input type="checkbox"/> b. Site functions as partner with business and industry economic development agencies and education and training providers. <input type="checkbox"/> c. Site works with state office to meet USDOL Performance Goals. <input type="checkbox"/> d. Communication related to issues/concerns.
SERVICE DESIGN	
2.	<ul style="list-style-type: none"> <input type="checkbox"/> Resources available to grantee; services grantee can offer customers in a user-friendly manner. <input type="checkbox"/> Appropriate basic skills and career information assessments are administered during the intake process and used to build Individual Employment Plans (IEPs). <input type="checkbox"/> Support services are provided (either directly or through referral) to all participants in need of these services. <input type="checkbox"/> Participants are being placed within an education or training program based on stated IEP educational goals. <input type="checkbox"/> Measurable goals have been established for all active participants and monitored for accomplishment to include employment referral and placement in accordance with stated IEP employment goal. <input type="checkbox"/> Professional development opportunities in the areas of program requirements, technology use, time and project management, customer service, and workforce system design are provided to all staff.
3.	<ul style="list-style-type: none"> <input type="checkbox"/> Interaction and coordination with job seeker services exists. <input type="checkbox"/> a. Grantee determines value and effectiveness of its services to business and industry. <input type="checkbox"/> b. Results and areas of growth are indicated. <input type="checkbox"/> c. All participants are enrolled in the state workforce system, Employ Florida Marketplace.
4.	<ul style="list-style-type: none"> <input type="checkbox"/> Satisfaction Surveys are conducted for program exiters and reported to state office.
5.	<p>Effective MOUs are in place with:</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Workforce Board <input type="checkbox"/> b. Educational and training providers <input type="checkbox"/> c. Employers <input type="checkbox"/> d. Support Service Agencies <input type="checkbox"/> e. Others as needed (explain)

ADMINISTRATIVE CONTROLS

6.	___ The organization maintains policies and procedures for core management functions and program operations.
7.	___ The provider monitors its programs and services, particularly as related to participant retention, performance attainment, and meeting participants' needs; ___ There is appropriate follow-up for any areas of concerns/findings noted.
8.	___ Record retention policies that meet the requirements of applicable Federal laws and regulations are in place and followed; ___ 90-Day FCDP Retention Review Cycle is followed.
9.	___ Staff meetings are held and minutes available.

CIVIL RIGHTS

10.	___ Policies and procedures developed in accordance with applicable laws and regulations are in place that demonstrate the grantee's commitment to the principles of the laws and regulations.
11.	___ Notices (in languages appropriate to the populations served) are visibly posted to inform staff, project participants, and service providers of the discrimination complaint process, Equal Opportunity (EEO), and Section 504 policies.
12.	Review of EEO/Non-Discrimination Policy ___ a. Posted broadly ___ b. Contained in media (brochures, enrollment forms etc.) ___ c. Contains all required elements
13.	___ Review of complaints are filed by participant.
14.	___ The grantee location and facility, or part of the facility, is physically accessible to and usable by disabled individuals.

ADVISORY COUNCIL

15.	___ Review of function and viability/by laws and purpose indicate that the council strengthens employment opportunities for FCDP eligible clients served.
16.	___ Meetings are held at least three times a program year.
17.	___ Review of meeting minutes indicates that meetings are held in accordance with state guidelines for advisory council meeting protocols.

18.	___ Members are involved in the planning and evaluation of the project.
19.	<p>___ Members include representatives of business and industry, workforce boards, and other pertinent entities.</p> <p>___ The board consists of a minimum of 5 members with each member representing a separate agency, group, or partnership from the following list:</p> <ul style="list-style-type: none"> • Chamber of Commerce/Small Business Development Center • Community Action Agency • Local Social Service Agency • Faith Based Organization • Top Employers/ Local Employer • Regional Workforce Board • Past Successful Participant • Parent Groups • Legal or Financial Representative (Local) • Politicians or Elected Official • Local Ad-hoc Educators • Local Secondary/Postsecondary Administrators • Educational Institutions • Career and Technical Education Institutions • Preparatory Institutions • Local Apprenticeship Programs • Media
INTERVIEWS, OBSERVATIONS RELATED TO PARTICIPANT RECORDS	
20.	___ Participant interviews reflect mission and vision of FCDP program are being met.
21.	<p>Participants Record – Validation Monitoring Checklists In Place</p> <ul style="list-style-type: none"> ___ a. FCDP Worksheet A ___ b. FCDP Worksheet B ___ c. FCDP Worksheet C ___ d. Work Related Activities ___ e. Exit Related Activities ___ f. FCDP State-wide Emergency Assistance (Annual Goal)
22.	<p>Case Note Format (Memo No. 13-04)</p> <p>Master record of contacts, decisions and participants' progress is kept according to the following format:</p> <ul style="list-style-type: none"> ___ a. Intake Comments ___ b. Monitoring Comments ___ c. Placement Comments ___ d. Exit Comments ___ e. Retention Comments ___ f. Miscellaneous

23.	<input type="checkbox"/> Case Manager interviews reflect an in-depth understanding of MSFW eligibility criteria, IEP development best practices, and retention follow-up protocols.
24.	<input type="checkbox"/> Notes made on observation of classroom, on-the-job-training, & work experience training
25.	<p>90-Day FCDP Retention Review Cycle</p> <input type="checkbox"/> a. The grantee is reporting participant retention follow-up information at the appropriate times per the 90-Day Review Cycle schedule. <input type="checkbox"/> b. The grantee is reviewing the Job Placement dates for accuracy and consistency.
26.	<input type="checkbox"/> Strategies are being implemented to recruit and screen participants who meet the target group criteria identified in the grant.
27.	<p>The grantee is serving the eligible/target population identified in the grant as indicated by a review of:</p> <input type="checkbox"/> a. Intake forms including application, assessment records, and IEP <input type="checkbox"/> b. Work History <input type="checkbox"/> c. Case Notes
28.	<input type="checkbox"/> The grantee is providing the full range of services stipulated in the grant agreement. (see RFA/RFP)
29.	<p>A review of participant files and Individual Employment Plans (IEPs) demonstrates that participants are receiving appropriate and effective services. (Memo No.13-03)</p> <input type="checkbox"/> a. Employment -The grantee develops Individual Employment Plan (IEP) that identifies and meets the specific employment needs of each individual participant. (see CRT) <input type="checkbox"/> b. Education - Participants are receiving training as needed and progressing toward achieving their goals (insure that training is not a stand-alone activity, i.e. training needs are part of a plan to reach the IEP employment goal. (see CRT) <input type="checkbox"/> c. Support services are being provided as needed to overcome client barriers to participation and completion of the individual plan.
HIGH-GROWTH JOBS	
30.	<input type="checkbox"/> The grantee provides information on high-growth occupations and regional economic trends to job seekers and employers.
31.	<input type="checkbox"/> Training activities are concentrated in those occupational areas having high-demand jobs in high-growth sectors.
32.	<input type="checkbox"/> The grantee provides effective job search and job placement services to place participants in high-growth occupational areas either on-site or through local partnerships.

33.	<p>The grantee coordinates its service delivery with other workforce agencies</p> <p>___ a. Customers have access to the full array of workforce partner services.</p> <p>___ b. Employer services are integrated to minimize duplicative employer contact and maximize access to employment information.</p>
PERFORMANCE	
34.	___ Date of last quarterly performance report _____.
35.	___ Existence of Performance Improvement Plans to resolve any needed improvements in meeting performance goals.
36.	___ Performance information, presented in a user-friendly format, is provided to oversight boards other relevant stakeholders, and to the general public to guide decision-making.
PERSONNEL	
37.	<p>Personnel policies and record are in place and in force</p> <p>___ a. Position descriptions are consistent with requirements to meet program goals.</p> <p>___ b. Provider's hiring, promotion, termination practices are sound.</p> <p>___ c. Staff resumes match PD's</p> <p>___ d. Staffing breakout forms on file with grant application are current and accurate.</p>
38.	<p>Time and Effort Certification / Personnel Activity Reports (PARs)</p> <p>___ a. Reflect an after-the-fact distribution of the actual activity of each employee</p> <p>___ b. Account for the total activity for which each employee is compensated</p> <p>___ c. Are prepared at least monthly and must coincide with one or more pay periods</p> <p>___ d. Are signed by the employee</p> <p>___ e. Are kept on file</p> <p>___ f. The organization has written policies and procedures for distributing program costs staff time, and general and administrative costs among programs</p>
39.	<p>Personnel certification requirements are met as follows:</p> <p>___ a. Level 2 Security Background Screening</p> <p>___ b. Eligibility Certification</p> <p>___ c. Tier I, Employ Florida Marketplace</p> <p>___ d. SUNTAX</p> <p>___ e. Case Management (if appropriate)</p> <p>___ f. TABE testing</p> <p>___ g. Kuder Assessment</p>

**FINANCIAL MANAGEMENT SYSTEM:
Statute Authority - EDGAR, Section 80.20(a)(1)-(6). UGG – Post Federal Award Requirements**

40.	<p>Off-site review of financial records</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Budget Narrative (in grant application – RFP/RFA) <input type="checkbox"/> b. Monthly reporting (599s)- timely, current, and accurate <input type="checkbox"/> c. Addendums applicable to financial resources <input type="checkbox"/> d. Grantee adheres to Florida Department of Education (FLDOE)/state office's policies regarding program and budget amendments.
41.	<p>On-site review of financial records</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Monthly reports—(599s) Documentation of Expenditures are accurate. <input type="checkbox"/> b. Supporting documents indicate all line items' charges and cost categories are accurate (according to the baseline budget and chart of accounts/Red Book). <input type="checkbox"/> c. The organization's accounting system is free of ambiguity.
42.	<p>Financial Reporting</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Fiscal policies and procedures are in place, which include standard accounting practices, budgeting, and documenting/reporting procedures. <input type="checkbox"/> b. Grantee monitoring of the grant's expenditures are within State and Federal statutes. <input type="checkbox"/> c. A process is in place where program and fiscal managers coordinate their activities so information can be shared.
43.	<p>Accounting Records</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. A process is used to maintain detailed accounting records. <input type="checkbox"/> b. A process is in place to link accounting, procurement, and inventory management systems (to minimize problems).
44.	<p>Internal Control</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Controls are in place to protect technology and equipment acquired with Federal funds. <input type="checkbox"/> b. Grantee assures property is used solely for authorized purposes.
45.	<p>Budget Control</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. A process is in place for reconciling (for consistency) budget amounts with actual expenditures where payments are based on expenditures and performance. <input type="checkbox"/> b. The working budget was planned to reflect changes that occur throughout the fiscal year, which limits revisions to uncontrollable circumstances.
46.	<p>Allowable Cost (see Allowable Cost Checklist)</p> <ul style="list-style-type: none"> <input type="checkbox"/> a. Staff positions are in place for approving grant expenditures (purchases). <input type="checkbox"/> b. A process is in place to ensure expenditures are "reasonable, allowable, and allocable."

47.	<p>Source Documentation</p> <p>___ A process is in place for documenting various accounting transactions (payroll, purchases, etc.).</p>
48.	<p>Grant Spending</p> <p>___ a. Grant spending occurs at a rate consistent with the amounts budgeted through the current quarter.</p> <p>___ b. Budget code integrity is maintained throughout the program year, i.e., expended funds do not exceed approved funds for the obligated budget object code.</p>
49.	<p>Meeting Forecasted Goals</p> <p>___ The grantee meets service level goals proposed in the grant agreement (stated goals in RFP).</p>
50.	<p>Plans to Utilize Remaining Funds</p> <p>___ The grantee meets all service level goals and will fully utilize all grant funds by the end of the grant period.</p>
51.	<p>Travel Expenditures for Staff</p> <p>___ a. Travel costs are paid in accordance with provider's and FDOE policy.</p> <p>___ b. Authorized by supervisor (signed)</p> <p>___ c. Supported by receipts</p> <p>___ d. Out-of-state travel costs are authorized by the Farmworker Career Development (FCDP) State Director (form is on file).</p>
<p>PROCUREMENT (purchasing and contracting): Statutory Authority-EDGAR Section 80.36(b)-(j)</p>	
52.	<p>Procurement Procedures</p> <p>___ a. Procurement procedures for purchasing equipment using grant funds are in place.</p> <p>___ b. Guidelines are in place describing how purchase requests are processed.</p> <p>___ c. Procurement procedures for contracting goods or services using grant funds are in place.</p> <p>___ d. The contract manager is known.</p>
53.	<p>Deliverables</p> <p>___ a. Internal controls are in place to guarantee contracts contain clear deliverables.</p> <p>___ b. A measure is used to determine when deliverables are completed.</p> <p>___ c. A system is in place to ensure contractors submit hard copies of invoices according to the schedule outlined in the contract or when deliverables are completed.</p>

54.	<p>Code of Standards of Conduct</p> <p>___ a. A process is in place to ensure staff members are aware of the information contained in the code of standards of conduct and abide by it.</p> <p>___ b. Keep records of previous code of ethics violations and how they were handled.</p> <p>___ c. Procedures are in place to assure persons procuring services do not have a conflict of interest in selecting, awarding, or administering the contract.</p>
55.	<p>Purchasing</p> <p>___ a. Procedures for practicing economical purchasing are in place.</p> <p>___ b. An agreement is in place that explains how purchasing potential is maximized.</p> <p>___ c. Procedures are in place, which describes the purchasing process for items less than \$1000.</p> <p>___ d. Procedures are in place, which describes the purchasing process for items more than \$5,000.</p> <p>___ e. The process for purchasing computers is in place.</p> <p>___ f. The process for purchasing classroom supplies (such as pencils) is in place.</p> <p>___ g. Purchase orders contain signature, date, quotes, approval (2 signatures on check).</p> <p>___ h. Purchases are acquired early enough to benefit the program during the PY.</p> <p>___ i. Procedures are in place to ensure purchases are not made at the end of a PY.</p>
56.	<p>Third-Party Contracts</p> <p>___ a. An updated contract, which comply with Florida Statues, Sections 215.422, 216.347, 216.3475, 287.058, and 287.133; Rule 60A-1.017, Florida Administrative Code is on file and easily assessable—containing the following:</p> <ul style="list-style-type: none"> • Scope of work • Performance standards • Remedies for non-performance <p>___ b. The organization has a system in place to assure sub-recipient audits are conducted and resolved.</p> <p>___ c. Measures are used to ensure contracts are not made with entities that have been suspended or debarred from participating in contracts supported with Federal funds.</p> <p>___ d. Contract's performance is monitored (how).</p> <p>___ e. Invoices support the payment requests.</p> <p>___ f. Procedures are in place for handling disputes with contractors (notify FLDOE and due process hearing).</p> <p>___ g. Travel guidelines for contractors are consistent with state travel requirements.</p>
<p>FISCAL – EQUIPMENT: Statue Authority-EDGAR Section 80.32(c)-(d)</p>	
57.	<p>Equipment Purchase Procedures</p> <p>___ The grantee has a system for the acquisition, management, and disposition of equipment purchased with grant funds.</p>

58.	<p>Equipment Purchase Approval</p> <p>___ The grantee has sought and received approval <u>prior</u> to purchasing equipment and has written evidence of prior approval received for items of equipment it has purchased with grant funds.</p> <p>___ Projected Equipment Purchases Form and purchasing documents are on file.</p>
59.	<p>Equipment Use</p> <p>___ a. The grantee uses equipment purchased with grant funds according to the scope of work.</p> <p>___ b. Staff members assigned to equipment purchased with grant funds are listed on the Staffing Breakout Form for the project year that is monitored.</p> <p>___ c. If the equipment is used for other projects, how is the process managed?</p> <p>___ d. What happens to equipment (purchased with grant funds) that is replaced?</p>
60.	<p>Management Requirements</p> <p>___ a. The staff position responsible for equipment is listed.</p> <p>___ b. A reasonable system is in place to track the purchase, use, and disposal of equipment.</p> <p>___ c. A process is in place to inventory equipment.</p> <p>___ d. Are all equipment purchased with grant funds listed on the grantee's equipment checklist?</p> <p>___ e. How often is grant-purchased equipment physically inspected?</p> <p>___ f. Grantee reconciles discrepancies between current and previous inventory at least bi-annually.</p> <p>___ g. When was reconciliation last performed? _____</p> <p>___ h. Guidelines are in place, which describe equipment storage and security framework.</p> <p>___ i. How is damage or theft handled? Were there any within the past 12 months?</p> <p>___ j. Who is responsible for maintaining the equipment? What are the current maintenance procedures?</p>
61.	<p>Disposition – Federal Equipment – Right to Transfer Title</p> <p>___ Procedures are in place for the disposition of equipment (acquired under Federal grant) that is no longer needed for the original project or program.</p>

**PARTICIPANT PROGRAM AND SERVICES FILE
MONITORING CHECKLIST/DATA VALIDATION**

Participant: _____ SS# last 4 digits: _____
 Project: _____ Intensive / Training _____ Related Assistance Services Only _____
 Date of Review: _____ Reviewer: _____ Initials: _____

DOCUMENTS		FILE/CRD Y or N	SIGNED Y or N	ERRORS Y or N	INITIALS
FCDP WORKSHEET A & B					
I.	ELIGIBILITY / DATA VALIDATION				
1.	MSFW Application (Sections E.1-E.7) or CRD Enrollment Application (documentation)				
2.	Work History Form				
	a. NAICs code for qualifying farm work				
	b. Employment Verification (labor force status) or				
	c. Sun Tax Report				
	d. Six Month Pre-program Earnings				
3.	Family Size Log / Dependents				
4.	Release of Information Form				
5.	Birth Date / Age (documentation)				
6.	Selective Service Information (if applicable)				
7.	Public Assistance Verification				
8.	Participant Complaint Procedures (includes non-discrimination policy)				
II.	FCDP PARTICIPANT SERVICES / DATA VALIDATION				
1.	Pre-program Assessment Record (TABE or CASAS)				
2.	Long-term agricultural employment (Documented)				
3.	Individual Employment Plan (IEP)				
4.	Case Notes (must be monthly and dated)				
5.	Classroom Training Form				
	a. Training Types in CRD agree with IEP				
	b. Training Types in CRD agree with Case Notes				
6.	Classroom Training Agreement				
7.	Post-program Assessment Records (TABE or CASAS)				
8.	Customer Satisfaction Surveys				
FCDP WORKSHEET C					
I.	EXIT MANAGEMENT AND DATA VALIDATION				
1.	Customer Status / Exit Report				
	a. Occupational Certificate / Credential				

DOCUMENTS		FILE/CRD Y or N	SIGNED Y or N	ERRORS Y or N	INITIALS
	b. Work Safety Training				
	c. Related Assistance				
	d. Exit Category				
2.	Placement Outcomes (if applicable)				
3.	Customer Follow-up (if applicable)				
	a. Retention Follow-up Q1				
	b. Retention Follow-up Q2				
	c. Retention Follow-up Q3				
	d. Total Earning for 2 nd and 3 rd Quarter				
WORK-RELATED ACTIVITIES					
1.	Work Experience Agreement-Assur. And Cert.				
2.	Work Experience Agreement (CRD)				
3.	On the Job (OJT) Agreement (CRD)				
	a. OJT Monitoring Report				
	b. OJT Training Invoice				
4.	Payroll Compliance Review				
	a. Weekly Attendance Sheet (<i>OJT / WEX / CRT</i>)				
	b. Voucher (s)				
	c. CRT Training Support Cost				
FCDP Statewide Emergency Assistance (EA-Only)					
	a. Case Notes				
	b. Voucher (s)				
COMMENTS:					

Farmworker Career Development Program

Eligibility Review and Data Validation Worksheet

Instructions: Coordinator (authorized reviewer) completes no later than 30 calendar days after enrollment/date of participation. All sources used to verify data elements below *should be in the participant's record*.

Participant Name: _____ SS No: _____
 Enrollment/date of participation _____ Project: _____

Part A Section I: Review of Application/Enrollment Form

1. Is applicant a:

- a. Citizen of the United States Yes No
- b. Non-citizen permitted to accept permanent employment in the United States by the Immigration and Naturalization Service:
 Card Number: _____ Exp. Date: _____ Yes No
- c. Non-citizen permitted to accept employment in the United States by the Immigration and Naturalization Services in accordance with TEGL 02-14 dealing with Deferred Action for Childhood Arrivals (DACA) participants:
 Card Number: _____ Exp. Date: _____ Yes No

2. If the applicant is eligible for registration under the Selective Service Act, is the applicant registered?
 Registration Number: _____ Yes No

Part A Section II: Review of the Family Income and Work History Record

Certification Period: From _____ To _____
 Applicant Six Month Pre-Program Earnings _____

1. Applicant is a farmworker No Dependent of a farmworker Yes No

Who, during above certification period, must have:

- a. Gained at least 50% of total earned income from farmwork or employed in farmwork at least 50% of work time. (Work History must be documented) Yes No
- b. Been a seasonal farmworker who worked a minimum of 25 days or earned at least \$800 doing seasonal farmwork. (Work History must be documented) Yes No
- 2. Applicant meets family income criteria by being a member of a family that either receives cash public assistance or has an annual family income that is less than the poverty/70% LLSIL. (Family Income record must be documented) Yes No
- 3. Have remaining items of the Application/Enrollment Form, the Work History Record and the Family Income Record been completed? Yes No
- 4. Have the forms been signed by:
 - a. Applicant? Yes No

b. Interviewer?

Yes

<input type="checkbox"/>
<input type="checkbox"/>

No

<input type="checkbox"/>
<input type="checkbox"/>

c. Authorized reviewer?

Yes

<input type="checkbox"/>
<input type="checkbox"/>

No

<input type="checkbox"/>
<input type="checkbox"/>

If all answers are YES, the information on the application is internally consistent and reasonable. If forms are incomplete or signatures are missing, corrective action must be taken immediately. If review reveals information that is unreasonable or is internally inconsistent, return to interviewer for correction/verification.

Signature of Coordinator / Authorized Reviewer

Date

Eligibility Review and Data Validation Worksheet

Instructions: Authorized reviewer completes no later than 30 calendar days after enrollment/date of participation. All sources used to verify data elements below *should be in the participant's record*.

Participant Name: _____ SS No: _____
 Enrollment/ date of participation: _____ Project: _____

Part B Section I		
Application/Enrollment, Work History and Family Income Record complete?	Yes []	No []
The above forms are reasonable and internally consistent?	Yes []	No []
Part B Section II		
Eligibility Item	Circle Verification Sources Used	
Citizen;	<ul style="list-style-type: none"> • Passport • Birth certificate • Voter registration card • Naturalization Certificate 	
Non-citizen;	<ul style="list-style-type: none"> • Employment Authorization Card • Alien registration documents • Employment Authorization Card (DACA) 	
Family Size / Dependents;	<ul style="list-style-type: none"> • Birth certificates • Family Bible • IRS 1040 form • Marriage certificates 	
Birth Date; Age;	<ul style="list-style-type: none"> • Federal, State, Local ID • Birth certificate / Hospital record of birth • Baptismal record • Driver's license • Passport • Public assistance / Social service records • School records/ID • Tribal records • Crossmatch w/Dept. of Vital Statistics • Alien registration documents • Voter's registration car 	
6 month pre-program earnings;	<ul style="list-style-type: none"> • Pay stubs • W-2 forms • IRS 1040 form • Employer payroll records • UI (unemployment) documents (Tax / wage printout) • One-Stop verification 	
Farm work Income during 12 month eligibility determination period; Family income; Seasonal criteria; Migrant / seasonal status;	<ul style="list-style-type: none"> • Pay stubs • W-2 forms • IRS 1040 form • Employer payroll records • UI (unemployment) documents (Tax / wage 	

	printout) • One-Stop verification
Eligibility Item	Circle Verification Sources Used
Registered for selective service; (if applicable)	<ul style="list-style-type: none"> • Registration card • Screen shot from: http://ww4.sss.gov/regver/verification1.asp • Selective service application
Public assistance; Eligibility for public assistance;	<ul style="list-style-type: none"> • Public assistance records • Social service agency verification • One Stop verification
Labor force status;	<ul style="list-style-type: none"> • Employer letter • One Stop verification • UI (unemployment) documents (Tax / wage printout) • Pay Stubs • Layoff notice • *Case notes, initialed and dated
Extension of certification period: Disabled; Incarcerated; Hospitalized; Military service;	<ul style="list-style-type: none"> • Vocational rehab agency letter • Social service agency letter • Veteran's administration letter • Hospital / physician records • Prison record • Court documents • DD 214 • Discharge papers

Part B Section III	
a. Participant eligible:	Yes [] No []
b. Above data verified:	Yes [] No []
c. Additional support documents required:	Yes [] No []

Part B Section IV	
Review Item	Circle Verification Sources Used
Release information	<ul style="list-style-type: none"> • Program/release information form
Date of participation;	<ul style="list-style-type: none"> • Application form with signature • Enrollment application with signature • IEP signed, dated • Case notes initialed, dated
Long-term agricultural employment (4 years documented);	<ul style="list-style-type: none"> • IRS 1040 Form • Application/Enrollment form with signature • UI (un-employment) documents (Tax / wage printout) • Pay stubs (4 years) • Tax/Wage printout (4years) • *Case notes initialed, dated

	<ul style="list-style-type: none"> • Work History Form • Employer letter
Review Item	Circle Verification Sources Used
Date of first intensive service; Pre-test;	<ul style="list-style-type: none"> • *Case notes initialed, dated • IEP signed, dated • Testing records
Date of first training service;	<ul style="list-style-type: none"> • IEP signed, dated • Classroom training/agreement (CRT) signed, dated • Attendance record • Enrollment record • Signed OJT agreement • *Case notes initialed, dated
Enrolled in a program or activity leading to an educational or occupational credential or license;	<ul style="list-style-type: none"> • *Case notes initialed, dated • IEP signed, dated • Classroom training (CRT) signed, dated • Attendance records from institution or instructor signed, dated
Post-test;	<ul style="list-style-type: none"> • Testing record • *Case notes initialed, dated

Signature of Authorized Reviewer / Title

Date

*Note: All case notes must be printed and filed in record on monthly basis.

Instructions: Completed after participant exit by authorized reviewer. All sources used to verify data elements below *should be in the participant's record.*

Participant Name: _____ SS No: _____
 Enrollment /date of participation: _____ Project: _____

Part C Section I	
Review Item	Circle Verification Sources Used
Date of exit	<ul style="list-style-type: none"> • Customer Status and Exit Report • Other Outcome • Case notes initialed, dated • Customer Follow up Form • Case manager / counselor termination notice
Category of exit / Other reason for exit	<ul style="list-style-type: none"> • Customer Status and Exit Report • Other Outcome • Case notes initialed, dated
Entered unsubsidized employment	<ul style="list-style-type: none"> • Letter from employer • Case notes initialed, dated • IEP signed, dated • Placement Outcome • Customer Follow up
Attainment of state recognized educational or occupational certificate, credential, diploma or degree	<ul style="list-style-type: none"> • Copy of credential attained • Instructor certification • Other Outcome • Case notes initialed, dated
Employed 1 st quarter after exit quarter Yes _____ No _____	<ul style="list-style-type: none"> • Pay stubs • Employer payroll records • IRS tax forms • UI (unemployment) documents (Tax / wage printout) • Case notes initialed, dated • Customer Follow up Form
Employed 2 nd and 3 rd quarter after exit quarter Yes _____ No _____	<ul style="list-style-type: none"> • Pay stubs • Employer payroll records • IRS tax forms • UI (unemployment) documents (Tax / wage printout) • Case notes initialed, dated • Customer Follow up
Total earnings 2 nd and 3 rd quarter after exit quarter	<ul style="list-style-type: none"> • Pay stubs • Employer payroll records • IRS tax forms • UI (unemployment) documents (Tax / wage printout) • Case notes initialed, dated • Customer Follow up

Part C Section II

a. Above data verified: Yes [] No []

b. Additional support documents required: Yes [] No []

If yes, explain:

Signature of Authorized Reviewer / Title

Date

Note: All case notes must be printed and filed in record on monthly basis.

ALLOWABLE COST PROTOCOLS

FISCAL – ALLOWABLE COSTS OVERVIEW CHECKLIST

Agency: _____ **Name of Form Completer:** _____
Date: _____ **Position of Form Completer:** _____

Directions: Did your Agency spend federal grant funds on any of the selected items below? Check **YES, NO or N/A**. If the answer is **YES**, to any of the selected items on this overview checklist, answer the related question(s) for the selected item in the Fiscal Allowable Costs Detail section below.

Selected Item of Cost	YES	NO	N/A	Selected Item of Cost	YES	NO	N/A
Advertising and public relations costs				Membership subscriptions and professional activity costs			
Advisory councils				Organization costs			
Alcoholic beverages				Participant support costs			
Alumni activities				Plant and security costs			
Audit costs and related services				Pre-award costs			
Bad debts				Professional service costs			
Bonding costs				Proposal costs			
Commencement and convocation costs				Publication and printing costs			
Compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits)				Rearrangement and conversion costs			
Contingency provisions				Recruiting costs			
Deans of faculty and graduate schools				Relocation costs			
Defense and prosecution of criminal and civil proceedings and claims				Rental costs of real property and equipment			
Depreciation and use allowances				Royalties and other costs for the use of patents and/or copyrights			
Donations and contributions				Scholarships and student aid costs			
Employee health and welfare costs				Selling and marketing costs			
Entertainment costs				Specialized service facilities			
Equipment and other capital expenditures				Student activity costs			
Fines, penalties, damages and other settlements				Taxes			
Fund-raising and investment management costs				Termination costs applicable to sponsored agreements			
Gains and losses on disposition of depreciable property and other capital assets and substantial				Training costs			

relocation of federal programs							
General costs of government				Transportation costs			
Goods or services for personal use				Travel costs			
Housing and personal living expenses				Trustees			
Idle facilities and idle capacity (unused capacity of partially used facilities)							
Insurance and indemnification							
Interest							
Labor relations costs							
Lobbying							
Losses on other awards or contracts							
Maintenance and repair costs							
Materials and supplies costs, including cost of computing devices							
Meetings and Conferences							

FISCAL – ALLOWABLE COSTS DETAIL QUESTIONS

Statutory Authority: UGG Subpart E-Cost Principles, General Provisions §200.400 Policy Guide, Special Considerations for States, Local Government and Indian Tribes § 200.416, § 200.405, Basic Consideration Allocable Cost, Cost Allocation Plans and § 200.56 Indirect Cost Proposals and Subpart F Audit Requirements § 200.500 Purpose. See the specific section of UGG to each item below:

Advertising and public relations costs § 200.421 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
<ol style="list-style-type: none"> Did the agency advertise staffing vacancies? In what media? Were federal funds used to purchase the advertisements? What other ads did the agency purchase? In what media? Did the agency use federal funds to cover costs of meetings or conventions? Displays, demonstrations, or exhibits? Meeting rooms, hospitality suites, booths or other special facilities? Did federal funding provide salaries and wages for employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings? Were federal funds used to cover costs of promotional items and memorabilia, including models, gifts, and souvenirs? Were the agency's advertising and public relations costs designed to promote the agency's programs or the agency itself? 			
Advisory councils § 200.422 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds used to cover any costs related to advisory councils?			
Alcoholic beverages § 200.423 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs of alcoholic beverages?			
Alumni(ae) activities § 200.424 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs incurred for or in support of alumni (ae) activities and similar services?			
Audit costs and related services § 200.425 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

1. Were federal funds expended for audit costs and related expenses such as audits required by, and performed in accordance with, the Single Audit Act?			
Bad debts § 200.426 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended to cover bad debts, including losses (whether actual or estimated) arising from uncollectible accounts and other claims, related collection costs, and related legal costs?			
Bonding costs § 200.427 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for bonding costs required by the federal government as assurance against financial loss to itself, including bonds such as bid, performance, payment, advance payment, infringement and fidelity bond?			
2. Are bonding costs required in the general conduct of operations of the agency?			
Commencement and convocation costs § 200.429 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs incurred for commencement and convocations?			
a. Were these funds expended for salaries and fringe benefits of members of the academic staff whose responsibilities to the institution require administrative work that benefits commencements and convocations?			
Compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits) § 200.430 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Salaries and wages charged to federal grants are documented as such?			
2. Is the total compensation reasonable for the services rendered? Does it conform to the established policy of the agency consistently applied to both federal and non-federal activities?			
3. Payroll is approved by finance official authorized to do so?			
4. Where employees work solely on a single federal award or cost objective, were charges for their salaries and wages supported by periodic certifications that the employees worked solely on that program for the period covered by the certification?			
a. Were these certifications prepared at least semi-annually and signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee?			
5. Where employees work on multiple activities or cost objectives, was a distribution of their salaries or wages supported by personnel activity reports (PARs)?			
a. Do these PARs reflect an after-the-fact distribution of the actual activity of each employee?			
b. Do they account for the total activity for which each employee is compensated?			
c. Are they prepared at least monthly and coincide with one or more pay periods?			
d. Are they signed by the employee?			
e. Do they reflect budget estimates or other distribution percentages determined before the services are performed? If so, they do not qualify as support for charges to federal awards.			
6. If federal funds have been expended for severance pay:			
a. Was severance pay required by law, by employee/employer agreement or by established written policy?			
b. Was severance pay associated with normal turnover and allocated as an indirect cost?			
Contingency provisions § 200.433 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended as contributions to a contingency reserve or any similar provision made for events the occurrence of which cannot be foretold with certainty as to time, intensity, or with an assurance of their happening? (The term "contingency reserve" excludes self-insurance reserves, pension plan reserves, and post-retirement health and other benefit reserves computed using acceptable actuarial cost methods.)			
Deans of faculty and graduate schools § 200.431 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for salaries and expenses of deans of faculty and graduate schools, or the equivalents, and their staff?			

Defense and prosecution of criminal and civil proceedings and claims § 200.435 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. If federal funds were expended for defense of criminal and civil proceedings and claims, were they for legal expenses required in the administration of federal programs?			
Depreciation and use allowances § 200.436 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended as compensation for depreciation and/or use allowances for the use of fixed assets (buildings, capital improvements, and equipment)? 2. Was the computation of depreciation or use allowances based on the acquisition cost of the assets involved? 3. Are the charges for use allowances or depreciation supported by adequate property records and physical inventories that are taken at least once every two years to ensure that the assets exist and are usable, used and needed?			
Donations and contributions § 200.434 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for contributions or donations (including cash, property, and services) made by the agency? 2. Was the value of donated or volunteer services (furnished to the agency by professional and technical personnel, consultants, or other skilled and unskilled labor) reimbursed as a direct or indirect cost using Federal funds? 3. Was the value of donated services received by the used to meet cost-sharing or matching requirements?			
Employee health and welfare costs § 200.437 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for the costs of employee information publications, health or first-aid clinics and/or infirmaries, recreational activities, employee counseling services, and any other expenses incurred in accordance with the agency's established practice or custom for the improvement of working conditions, employer-employee relations, employee morale, and employee performance? a. Were such costs equitably apportioned to all activities of the agency? b. Was income generated from any of these activities offset against expenses?			
Entertainment costs § 200.438 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities)?			
Equipment and other capital expenditures § 200.439 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for acquisition costs of capital assets (for general purpose equipment, buildings and land) or for expenditures to make improvements to capital assets that materially increase their value or useful life? a. If capital expenditures were direct charges to the grant, were they approved in advance by FDOE? b. Were equipment and other capital expenditures included in indirect costs? c. When equipment purchased wholly or partly with federal funds is replaced, what is done with the replaced equipment? Is it used as a trade-in? Is it sold and the proceeds used to offset the cost of the replacement property? Is it surpluses? Is it given to another federal program for use in that program? d. When approved as a direct charge, were these capital expenditures charged in the period in which the expenditure was incurred, or as otherwise determined appropriate by and negotiated with FDOE?			
Fines, penalties, damages and other settlements § 200.441 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

1. Were federal funds expended to cover costs resulting from violations of, or failure of the agency to comply with federal, state, and local or foreign laws and regulations?			
Fund-raising and investment management costs § 200.442 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended to cover costs of organized fund raising? 2. Were federal funds expended to cover costs of investment counsel and staff and similar expenses incurred solely to enhance income from investments? 3. Were federal funds expended for costs associated with investments covering pension, self- insurance, or other funds which include federal participation allowed by UGG §200.403 and §200.442.			
Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of federal programs § 200.443 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were gains and losses on the sale, retirement, or other disposition of depreciable property included in the year in which they occur as credits or charges to the asset cost grouping(s) in which the property was included?			
General costs of government § 200.444 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for any of the following general costs of government: <ol style="list-style-type: none"> Salaries and expenses of the Office of the Governor or a state or the chief executive of a political subdivision or the chief executive of a federally recognized Indian tribal government? Salaries and other expenses of a state legislature, tribal council, or similar local governmental body, such as a county supervisor, city council, school board, etc., whether incurred for purposes of legislation or executive direction? Costs of the judiciary branch of a government? Costs of prosecutorial activities unless treated as a direct cost to a specific program if authorized by program statute or regulation (however, this does not preclude the allow ability of other legal activities of the attorney general)? 2. Were federal funds expended for the portion of salaries and expenses directly attributable to managing and operating federal programs by the chief executive of a federally recognized Indian Tribal Government or Councils of Governments (COGs) and his or her staff?			
Goods or services for personal use § 200.445 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs of goods or services for personal use of the agency's employees? 2. Were these costs reported as taxable income to the employees?			
Housing and personal living expenses § 200.445 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for "costs of housing (such as depreciation, maintenance, utilities, furnishings, rent), housing allowances and personal living expenses for the agency's current or past officers? 2. Were these costs reported as taxable income to the employee?			
Idle facilities (completely unused facilities) and idle capacity (unused capacity of partially used facilities) § 200.446 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

<ol style="list-style-type: none"> 1. Were federal funds expended for “cost of idle facilities” such as maintenance, repair, housing, rent, and other related costs such as insurance, interest, property taxes, and depreciation or use allowances? <ol style="list-style-type: none"> a. Were the costs of idle facilities necessary to meet fluctuations in workload? b. Were facilities idle due to changes in program requirements, efforts to achieve more economical operations, reorganization, and termination or due to unforeseen reasons? 2. Were federal funds expended for maintenance, repair, housing, rent and other related costs such as insurance, interest, property taxes and depreciation or use allowances for equipment and/or buildings with idle capacity? <ol style="list-style-type: none"> b. Were the costs of idle capacity normal costs of doing business and a factor in the normal fluctuations of usage from period to period? 			
Insurance and indemnification § 200.447 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
<ol style="list-style-type: none"> 1. Were the costs of insurance required or approved and maintained as required by the federal award? 2. Were federal funds expended for costs of other insurance maintained by the agency in connection with the general conduct of its activities? <ol style="list-style-type: none"> a. Were the types and extent and cost of coverage in accordance with sound business practices? b. Were the costs for insurance or of any contributions to any reserve covering the risk of loss of or damage to federally owned property? 3. Were the costs for actual losses which could have been covered by permissible insurance (through self-insurance or otherwise)? 4. Were these costs for deductibles or minor losses not covered by insurance, such as the spoilage, breakage and disappearance of small hand tools? 5. Were the contributions to a reserve for certain self-insurance programs including workers compensation, unemployment compensation, and severance pay? 6. Were the costs for actual claims paid to or on behalf of employees or former employees for workers compensation, unemployment compensation, severance pay and similar employee benefits? 7. Were the costs for indemnification, securing the agency against liabilities to third persons and other losses not compensated by insurance, and expressly provided for in the federal award? 8. Were the costs for commercial insurance to protect against costs of the contractor for corrections of the contractor’s own defects in materials or workmanship? 			
Interest § 200.449 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred for interest on borrowed capital or the use of the agency’s own funds? 2. Were federal funds expended for financing costs (including interest) paid or incurred which are associated with otherwise allowable costs of building acquisition, construction, or fabrication, reconstruction or remodeling completed on or after October 1, 1980? 3. Were federal funds expended for financing costs (including interest) paid or incurred on or after September 1, 1995, for land or associated with otherwise allowable costs of equipment? 			
Labor relations costs § 200.430 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred in maintaining satisfactory relations between the agency and its employees, including costs of labor management committees, employees’ publications and other related activities? 			
Lobbying § 200.450 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
<ol style="list-style-type: none"> 1. Were federal funds expended for the cost of certain influencing activities associated with obtaining grants, contracts, cooperative agreements, or loans? 2. Were federal funds expended for executive lobbying costs? 			
Losses on other awards or contracts § 200.451 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

1. Were federal funds expended for any excess of costs over income under any other award or contract of nature? (This includes, but is not limited to, the agency's contributed portion by reason of cost-sharing agreements or any under-recoveries through negotiation or flat amounts for F&A costs.)			
Maintenance and repair costs § 200.452 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs incurred for necessary maintenance, repair, or upkeep of buildings and equipment (including federal property unless otherwise provided for) which neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in an efficient operating condition? (Costs incurred for improvements which add to the permanent value of the buildings and equipment or appreciably prolong their intended life shall be treated as capital expenditures.)			
Materials and supplies costs, including cost of computing devices § 200.453 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs incurred for materials, supplies and fabricated parts necessary to carry out a federal award? 2. Were purchased materials and supplies charged at their actual prices, net of applicable credits? (Withdrawals from general stores or stockrooms should be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs.) 3. Were materials and supplies actually used for the performance of a federal award charged as direct costs? 4. Was there a charge for federally-donated or furnished materials used in performing the federal award?			
Meetings and conferences § 200.432 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for the costs of meetings and conferences, the primary purpose of which is the dissemination of technical information? (This includes costs of meals, transportation, rental of facilities, speakers' fees, and other items incidental to meetings or conferences.)			
Memberships, subscriptions and professional activity costs § 200.454 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs of the agency's: a. Membership in business, technical, and professional organizations? b. Subscriptions to business, professional, and technical periodicals; and/or c. Membership(s) in any organization that engages in lobbying activities?			
Organization costs § 200.455 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Was approval obtained from the awarding agency prior to the expenditure of federal funds for any of the following? (Incorporation fees, brokers' fees, fees to promoters, organizers or management consultants; attorneys, accountants, or investment counselors, whether or not employees of the organization, in connection with establishment or reorganization of an organization.)			
Participant support costs § 200.456 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Was approval obtained from the awarding agency prior to the expenditure of federal funds or stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (not employees), in connection with meeting conferences, symposia or training projects?			
Plant and security costs § 200.457 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for any of the following activities? a. Necessary and reasonable expenses incurred for routine security to protect facilities, personnel, and work products? (expenses, such as: wages, and uniforms of personal engaged in security activities, equipment, barriers, contractual security services, consultants)			
Pre-award costs § 200.458 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

1. Were federal funds expended for costs incurred prior to the effective date of the award directly pursuant to the negotiation and in anticipation of the award, where such costs are necessary for efficient and timely performance of the scope of work?			
Professional service costs § 200.459 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for the costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill and who are not officers or employees of the agency?			
Proposal costs § 200.460 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended on costs of preparing proposals for potential Federal Awards?			
Publications and printing costs § 200.461 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for publications costs of printing (including the processes of composition, plate-making, press work, binding, and the end products produced by such processes), distribution, promotion, mailing, general handling and/or page charges for professional publications? 2. Were costs not identifiable with a particular cost objective allocated as indirect costs to all benefiting activities of the agency? 3. If federal funds were expended for page charges for professional journal publications as a necessary part of research costs, did the research papers report work supported by the federal government? 4. Are the charges levied impartially on all research papers published by the journal, whether or not by federally-sponsored authors?			
Rearrangement and reconversion costs § 200.462 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs incurred for ordinary and normal rearrangement and alteration of facilities? 2. Was prior approval granted from by the USDOE for special arrangements and alteration costs incurred specifically for the project? 3. Were federal funded expended for costs incurred in the restoration or rehabilitation of the agency's facilities to approximately the same condition existing immediately prior to the commencement of a federal award? 4. Were federal funds expended to cover the cost of wear and tear on the agency's facilities?			
Recruiting costs § 200.463 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs incurred pursuant to a well-managed recruitment program to recruit staff in keeping with workload requirements? (These costs include: "help wanted," advertising, operating costs of an employment office necessary to secure and maintain and adequate staff, costs of operating and aptitude and educational testing program, travel costs of employees while engaged in recruiting personnel, travel costs of applicants for interviews for prospective employment and relocation costs incurred incident to recruitment of new employee.) 2. Did the agency use employment agencies that charges standard commercial rates? 3. In publications, did help-wanted advertising include color, material than for recruitment purposes or excessive size? 4. Did recruiting enticements meet the test of reasonableness and conform to the established practices of the agency? 5. Has the agency refunded or credited relocation costs when the costs were incurred incidental to the recruitment of a new employee who reigned for reasons within his control within 12 months of hire?			
Relocation costs § 200.464 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A

1. Were funds used for relocation costs for permanent change of duty or assignment for an indefinite period or for a stated period not less than 12 months, of an existing employee or upon recruitment of a new employee?			
Rental costs of real property and equipment § 200.465 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Are rental costs reviewed periodically to determine reasonableness? (Based on rental costs of comparable property and/ or equipment, market conditions in the area, alternative available, type, life expectancy, condition and value of the property leased.)			
2. Are rental costs under “sale and lease back” and “less than arms-length,” leases equal to the amounts that would have been allowed had title to the property or equipment been held by the agency?			
Royalties and other costs for the use of patents § 200.448 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Have federal funds been expended on royalties on a patent or copyright or amortization of the cost of acquiring by purchase a copyright, patent, or rights, necessary for the proper performance of the award?			
2. Does the federal government have a license or the right to free use of the patent or copyright?			
3. Has the patent or copyright been adjudicated to be invalid, or been administratively determined to be invalid?			
4. Is the patent or copyright considered to be unenforceable?			
5. Has the patent or copyright expired?			
6. Did the agency exercise special care in determining reasonableness where the royalties may have been arrived at as the result of a less-than-arm’s-length bargaining? (Such as with persons or corporations affiliated with the agency or unaffiliated parties under an agreement entered into in anticipation that a federal award would be made.)			
Scholarships and student aid costs § 200.466 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs of scholarships, fellowships and other programs of student aid to provide training to selected participants and the charge was approved by the sponsoring agency?			
2. Were the tuition remission and other forms of compensation paid as, or in lieu of, wages to students performing necessary work or conducting activities necessary to the sponsored agreement?			
3. Were these forms of compensation provided in accordance with established institutional policy?			
4. Was the tuition or other payments reasonable compensation for the work performed?			
Selling and marketing costs § 200.467 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs of selling and marketing any products or services of the agency?			
Specialized service facilities § 200.468 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs of services provided by highly specialized facilities operated by the agency, such as computing, facilities, wind tunnels, and reactors?			
Student activity costs § 200.469 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for costs incurred for intramural activities, student publications, student clubs and other student activities?			
Taxes § 200.470 UGG	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
1. Were federal funds expended for taxes which the organization is required to pay and which are paid or accrued in accordance with General Accepted Accounting Principles (GAAP)?			
2. Were federal funds expended for payments, in lieu of taxes, which are commensurate with the local government services received?			

3. Were these payments for taxes from which exemptions are available to the institution directly or which are available to the institution based on an exemption afforded the federal government?
4. Were these payments for special assessments on land which represent capital improvements?
5. Were refunds of taxes, interest, or penalties, and any payment to the institution of interest thereon, attributable to taxes, interest, or penalties which were allowed as sponsored agreement costs, credited or paid to the federal government in the manner directed by the federal government?