

Department of Education
Office of Inspector General – Internal Audit
Six-Month Status Report on: Bureau of Family and Community Outreach
Report # A-1617-011 Issued: June 26, 2017
Status as of December 29, 2017

Finding	Recommendation(s)	Management Response as of June 29, 2017	Management Response as of December 29, 2017	Anticipated Completion Date & Contact
<p>BFCO’s grants monitoring process does not include tools or procedures to identify overlap amongst grant recipients and sub recipients.</p>	<p>We recommend that BFCO implement tools and processes to track recipients and sub recipients by location so they can identify recipients and sub recipients that receive multiple grants for the same client services. These tools and processes may include but not be limited to:</p> <ul style="list-style-type: none"> • Recording addresses and other identifying information on each recipient and sub recipient, • Requiring recipients and sub recipients to submit initial rosters on the clients they serve in an electronic format complete with demographic information so individual clients can be identified and compared across multiple grants, • Creating a database to house all sub recipient and client information to facilitate data analytics; and • Tracking clients served by grant recipients and sub recipients that receive multiple grants and periodically conducting data 	<p>We agree that neither the monitoring process for federal or state grants include tools or procedures to identify overlap. We will work towards the creation of a database for BFCO awards as there is funding available for monitoring of the federal awards. Also, we are considering the feasibility of a legislative budget request to build a reporting database.</p>	<p>BFCO has identified a software system that works to track the project activities of each 21st CCLC by site location. We are working to procure the software solution for use by BFCO grants.</p>	<p>June 2018</p>

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	<p>analyses to determine whether grant recipients and sub recipients are paying for the same client services through multiple grants.</p>			
<p>Grant recipients and sub recipients served the same clients with multiple grants for the same service.</p>	<p>We recommend that BFCO periodically conduct data analyses to determine whether the same grant recipient is serving grant clients through multiple grants. We recommend that BFCO conduct structured, on-site monitoring to Boys and Girls Clubs that receive both 21st CCLC grants and state grant allocations from the Florida Alliance of Boys and Girls Clubs to ensure compliance with grant terms and ensure attendance reporting anomalies are corrected. We additionally recommend BFCO revise the Florida Alliance contract language to ensure consistent scopes of work.</p>	<p>We have added an element to the 21st CCLC risk assessment to determine if programs have other funding. If agencies have other funding sources, this increases their score on the newly developed risk assessment. The new risk assessment will be conducted in August of 2017. Additionally, we will review the general risk assessment document submitted by all recipients of federal funds as part of the approval process (DOE 610 or 620). Subsequently, desktop and onsite</p>	<p>We completed the risk assessment table for the 2017-2018 21st CCLC programs. This table includes a risk score for programs that have additional funding from the Bureau of Family and Community Outreach. If a program has one or more additional grants, its overall risk score is increased. This risk assessment will be used in determining which programs should be prioritized for monitoring. After</p>	<p>June 2018</p>

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		monitoring will be scheduled and conducted.	completing the risk assessment table, there are several Boys and Girls Club projects that have been identified for onsite monitoring.	
BFCO did not provide timely feedback to sub recipients	We recommend that BFCO enhance their structured monitoring process to expedite report processing so they can provide more timely feedback to the grant sub recipients. We additionally recommend BFCO allocate additional staff to conduct structured monitoring on-site visits.	The 21 st CCLC Monitoring and Compliance Unit has been given a deadline of June 30, 2017, to submit all reports to BFCO leadership for review. We anticipate that all reports will be ready for routing by July 31, 2017. We anticipate all reports will be disseminated by mid Fall. We have created a timeline for the 17-18 work of the Monitoring and	The 21 st CCLC Monitoring and Compliance Unit submitted all reports to BFCO leadership. The reports were routed to FDOE leadership, then disseminated to the monitored programs between September 25 and November 9, 2017. One report remains outstanding due to	December 2017

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		<p>Compliance Unit and are currently developing the process for implementation.</p>	<p>further issues identified by the department.</p> <p>The Monitoring and Compliance Unit will begin on-site and desktop monitoring of 2017-2018 programs starting in January 2018. All four monitoring staff as well as the 21st CCLC Assistant Director will be traveling to conduct onsite monitoring.</p>	
<p>BFCO did not conduct risk assessments timely.</p>	<p>We recommend that BFCO complete annual risk assessments to ensure structured monitoring is based on risk, new grants are identified, and variables are evaluated appropriately. We additionally recommend BFCO conduct risk assessments early in the fiscal year to identify high risk grant sub recipients and promptly conduct monitoring visits.</p>	<p>We worked to revise the risk assessment in May 2017. It is now developed and will be conducted in August 2017. Additionally, we will review the general risk assessment document submitted by all recipients of federal funds as part of the approval process (DOE 610 or 620).</p>	<p>BFCO conducted a risk assessment of all 2017-18 programs. The assessment was finalized on September 5, 2017. Each program had a risk score and risk level assigned to it. These risk scores are used to prioritize future monitoring.</p>	<p>Completed.</p>

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<p>BFCO did not review monthly deliverables timely.</p>	<p>We recommend that BFCO ensure review of deliverables occurs during the required timeframe. We recommend that BFCO develop a process to inform the Comptroller’s office of approved or declined deliverables for public entities. We additionally recommend that BFCO prioritize structured on-site monitoring of 21st CCLC programs in order to identify significant deficiencies.</p>	<p>The Bureau of Contracts, Grants, and Procurement Management is working with the Comptroller’s Office to develop a department-wide procedure for addressing the status of deliverables for all programs including the cash-advance (public entity) programs. By August 30th, we will meet with our contact in the Comptroller’s Office to ensure the implementation of the new procedures. We will plan to implement the options by September 30th coinciding with the due date for the first set of deliverables for the 17-18 program year. As noted in the RFP/A, deliverables are to be reviewed within five days of submittal or the listed due date. We have</p>	<p>BFCO has developed a system for submitting and tracking deliverables documentation as well as tracking the approval status of each deliverable. Programs email their deliverables directly to their Program Development Specialist. The PDS then saves the deliverables to the network drive and updates the deliverables tracking spreadsheet with the approval status of the deliverable, including the date on which it was approved or declined. BFCO works with the Comptroller’s Office to ensure that this documentation process can be used as part of</p>	<p>December 2017</p>

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		<p>realigned the deliverables for the 2017-2018 year to streamline the reporting process to allow for more timely submission from programs and timely review for the team.</p>	<p>the reimbursement packages for performance-based programs. For public entities, the linking of the deliverables to the activities of the Comptroller’s Office may be part of the EGMA system that is forthcoming from the Department.</p>	

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<p>Grant recipients and sub recipients served the same clients with multiple grants for the same service.</p>	<p>We recommend that the Collier County Boys and Girls Club improve its attendance record keeping.</p>	<p>The Boys & Girls Club of Collier County (BGCCC) does not serve the same clients with multiple grants for the same service.</p> <p>BGCCC does recognize the need for improved attendance record keeping to ensure all data is correct and accurate. When asked to pull SAI records, due to unclear coding in our attendance database all students (21st CCLC and non-21st CCLC) were unknowingly pulled and submitted in the areas of Triple Play Daily Challenge and Power Hour. Both of these are approved 21st CCLC and SAI activities but are separated at the</p>	<p>Upon positive dialogue with the Office of Inspector General in late June, 2017, Boys & Girls Club of Collier County (BGCCC) immediately reviewed all members in our database to verify and correct and any coding issues. This ensures that when we are asked to submit reports we are confident that we are pulling the correct information and not duplicating youth in reporting as they are not duplicated in funding.</p> <p>BGCCC is compliant with the new Alliance contract for 2017-18 which outlines that our</p>	<p>July, 2017 Megan McCarthy</p> <p>August, 2017- May, 2018 (duration of contract)</p>

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		<p>Club so there is no crossover of students and, most importantly, no crossover of finances. This separation was not reflected in the reports that BGCCC submitted because of coding issues. Through this audit this issue was discovered and we worked to immediately rectify the issue.</p> <p>Additionally noted was that 30 students did not receive a weekly required SAI activity after 5:30pm however in the BGCCC signed (6/14/16) contract with the Florida Alliance that runs from July 1, 2016-June 30, 2017 under scope of work #2 “Student Assistance Initiative program from BGCA -</p>	<p>SAI Programs will ‘provide innovative programs designed to empower youth to excel in school, become good citizens and lead healthy, productive lives from BGCA and/or locally developed programs to all Club Members during the Club hours of operation’ and further that ‘Mentoring Programs will be provided to Club members who are in 5th-12th grade for a minimum of one session each week’. This is separate from 21st CCLC funding that BGCCC has applied for and is waiting for official approval.</p>	<p>Megan McCarthy</p>

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		<p>Selected Academic Success, Character and Leadership Development, Healthy Lifestyles and/or from Community for Education Foundation - Curriculum will be provided to Club members (5th -12th grade) for a minimum of one program per month”. BGCCC complies with this requirement and provides at a minimum one SAI program per month as outlined in contract.</p>		