

Quality Assurance and Compliance Desk Monitoring Review for Perkins Career and Technical Student Organizations

Florida Association and Foundation of Family, Career and Community Leaders of America, Inc.

February 4-6, 2019

Final Report

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Florida Department of Education Division of Career and Adult Education

Florida Association and Foundation of Family, Career and Community Leaders of America, Inc. Career and Technical Education Quality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Florida Department of Education (FDOE), Division of Career and Adult Education (division), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The Quality Assurance and Compliance section is responsible for the design, development, implementation and evaluation of a comprehensive system of quality assurance including monitoring. The role of the quality assurance system is to assure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is incumbent upon the division to monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

The FLDOE receives federal funding from the U.S. Department of Education (USDOE) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Career and Technical Education Act of 2006 and for Adult Education (AE) under the Adult Education and Family Literacy Act of 1998. FLDOE awards subgrants to eligible providers to administer local programs. FLDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for CTE and adult education/family literacy. Each state shall have procedures for reviewing and approving applications for subgrants and amendments to those applications, for providing technical assistance, for evaluating projects, and for performing other administrative responsibilities the state has determined are necessary to ensure compliance with applicable statutes and regulations pursuant to 34 CFR 76.770, Education Department General Administrative Regulations (EDGAR) and the Uniform Grant Guidance (UGG) for grant awards issued on or after December 26, 2014. The Florida Department of Education, Division of Career and Adult Education is required to oversee the performance of subgrantees in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes).

Additional citations noting pertinent laws and regulations and authority to monitor are located in the 2018-2019 Quality Assurance Policies, Procedures, and Protocols, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES, AND PROTOCOLS

The Quality Assurance Policies, Procedures, and Protocols manual was revised in the 2018-19 program year. The manual is provided to each provider prior to the monitoring visit. The manual provides a summary of each facet of the monitoring design and the process. It also contains protocols that may be used as agencies are monitored or reviewed. References may be made to the manual in this document; it is located on the division's website at http://fldoe.org/academics/career-adult-edu/compliance.

IV. PROVIDER SELECTION

Various sources of data are used throughout the implementation of the quality assurance system. The monitoring component of the system is risk-based.

Risk assessment is a process used to evaluate variables associated with the grants and assign a rating for the level of risk to the department and the division. A risk matrix, identifying certain operational risk factors is completed for each provider. The risk matrix for each program monitored is located in Appendix A. The results of the risk assessment process and consideration of available resources are used to determine one or more appropriate monitoring strategy(ies) to be implemented.

The monitoring strategy for Florida Association and Foundation of Family, Career and Community Leaders of America, Inc. (FCCLA) was determined to be a desk monitoring review. Notification was sent to Mr. Patrick Grady, executive director, FCCLA on November 19, 2018. The designated representative for the agency was Ms. Wendi Hileman, state coordinator, FCCLA.

The desk monitoring review for the agency was conducted on February 4-6, 2019 by a representative of the Quality Assurance and Compliance section of the division: Mr. Michael Swift, program specialist.

V. Florida FCCLA, Inc.

The provider was awarded the following grants for FYs 2016 -17, 2017-18 and 2018 -19:

2016-2017

pended Funds
0.00
spended Funds
0.00
0.00
spended Funds
N/A

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

VI. MONITORING ACTIVITIES

The desk monitoring review activities included administrative, financial, review of deliverables and an exit conference call.

Exit Conference

The exit telephone conference was conducted via conference call on May 8, 2019. The participants are listed below:

Name	Title	Exit
Wendi Hileman	State Coordinator	X
FLDOE		
Andrew Goldsmith	Program Specialist IV, FDOE	X
Michael Swift	Program Specialist IV, FDOE	X

Records Review

Program, financial and administrative records were reviewed. A complete list is provided in section VII, item B. Policies and procedures were also reviewed.

VII. RESULTS

- **A.** <u>ADMINISTRATION</u> refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
 - The day to day operation of FCCLA is run by a board approved state coordinator. State leadership is provided by a Board of Directors; up to 13 state officers; and district advisors from across the 10 districts in Florida. The Board of Directors also serves as the FCCLA advisory committee.
 - The state coordinator is responsible for managing the FDOE Perkins grant, submitting quarterly deliverables to FDOE, as well as other duties detailed within the provider's approved grant application.
 - FCCLA does not have staff development training, but multiple learning and training opportunities are provided to district advisors and school guidance counselors on a local and state level.
 - Although FCCLA does not require for students to self-declare a disability, they are made aware of any special accommodations that students may need from their local school district.
 - FCCLA retains electronic accounting records indefinitely within their financial management system, and physical copies of all records are held in accordance with state law.
- **B.** <u>RECORDS REVIEW</u> refers to a review of the records and documents that demonstrate compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.
 - Purchasing and procurement policies and procedures
 - All deliverables submitted to FDOE for fiscal years 2016-17 and 2017-18
 - Bank statements
 - Time and effort certification(s) for the state coordinator
 - Desk Monitoring Review packet
- **C. FINANCIAL** refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management, and allowable costs.
 - The sole use of their federal grant award money is the salary of the FCCLA State Director.
 - FCCLA has detailed financial policies and procedures that explicitly lay out the step by step processes for purchasing and procurement, as well as managing contracts and grants. The automated requisition tracking system (ARTS) is used as their internal budgeting and financial management system.
 - An annual budget is prepared by the state coordinator prior to the beginning of each fiscal year and submitted to the Board of Directors for approval.
 - Purchases go through a multi-tier process that require electronic signatures along the way, and
 then go to a separate budget reviewer for final approval. Internal controls ensure that only select
 individuals have access to the approval process, and each individual is provided with their own
 unique log-in and access credentials.
 - Bank records and employee time and effort reports were made available to the monitoring staff upon request.

- All quarterly deliverables for the time period monitored were submitted to FDOE in a timely manner and contained all of the expected deliverables and appropriate documentation.
- All deliverables were approved by FDOE, and resulted in full payment of their federal award. There were no unexpended funds or rejected deliverables over the course of the years monitored.

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER TECHNICAL EDUCATION

1. Corrective Action Plan (findings) –FCCLA is not required to complete a corrective action plan.

IX. SUMMARY

Once the desk monitoring review is complete, including receipt of requested information, a preliminary report will be forwarded to the provider for review. Comments are accepted and considered. Once approved, the final report will be mailed to the President of the Board of Directors and posted on the department's website at the following address: http://fldoe.org/academics/career-adult-edu/compliance.

The division will issue a closure notice to the President of the Board of Directors and contact designee once all outstanding resolution items have been completed (if applicable).

On behalf of the department, Mr. Michael Swift extends his appreciation to all participants in the Florida FCCLA, Inc. desk monitoring review. Special thanks is offered to Ms. Wendi Hileman for her participation in this process.

APPENDIX A

Florida FCCLA, Inc. Career and Technical Education Risk Matrix

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

Agency Name: Florida FFCLA, INC

Program type: CTE
Target Year: 2016-2017
Monitoring Year: 2018-2019

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
	7 or More	7	1	<u>X 10</u>	10
*Last	5-6	5			
Monitored	3-4	3			
	0-2	1			
	Upper Quartile	7		<u>X 8</u>	24
Total Perkins	Upper Middle	5			
Budget	Lower Middle	3	3		
Allocated Value	Lower Quartile	1			
	4 or More	7	1	<u>X 8</u>	8
# Perkins	3	5			
Grants Value	2	3			
	1	1			
Perkins Director	Yes	7	0	X 6	0
Change Value	No	0		====	
Ü	Upper Quartile	7	0	<u>X 4</u> 0	0
Perkins Funds	Upper Middle	5			
Remaining	Lower Middle	3			
Point Value	Lower Quartile	1			
	0	0			
	42				

^{*}Compliance monitoring last visit: N/A

*Data sources used for calculations: Prior to July 1, 2016