



# SPRING 2019 Provider Training

Quality Assurance and Compliance Monitoring



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# Spring 2019 Provider Training Webinar

December 13, 2018

10:00 AM – 12:00 PM (EST)

Webinar registration link:

[www.gotomeeting.com/webinar/homepage](http://www.gotomeeting.com/webinar/homepage)

Call number: 1-888-670-3525

Participant Access Code: 4632608161 then  
press #

## **Please minimize background noise during the webinar.**

- Please keep your phone on mute to listen to the webinar. This eliminates background noise and discussions from disrupting the webinar.
- If your phone does not have a mute button, press \*6
- Press \*5 to enter conference mode, unlock call at end of presentation.

# **FACILITATOR**

Tashi Williams, Compliance Director

Quality Assurance and Compliance Section  
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# Objectives of Webinar

To provide participants with information regarding grant program monitoring scheduled for Fiscal Year 2018-19



# Fiscal Years and Programs Monitored

- Fiscal Years (FY) monitored:
  - 2016-17, 2017-18 and 2018-19
- Grant Programs to be monitored:
  - Adult Education (AE)
  - Carl D. Perkins (CTE)

# Topics to be Covered on the Webinar

- Regulatory requirements
- Why do we monitor?
- What is our way of work?
- Enhancements to the Risk Assessment
- How do we select agencies to monitor?
- Agencies selected for fall 2018 monitoring
- Monitoring strategies and areas of focus
- Pre-visit, on-site, and post-visit
- Items to have available for review
- Program of Study Requirement
- Post-visit monitoring report
- Examples of findings and concerns found during monitoring review
- General Q & A



# Regulatory Requirements

- Federal and state requirement
  - 2 C.F.R. Part 200, Uniform Grant Guidance (link below)  
<http://www.ecfr.gov/cgi-bin/text-idx?SID=704835d27377ef5213a51c149de40cab&node=2:1.1.2.2.1&rgn=div5>
- 2 C.F.R. Part 200.61 and 200.62 (Internal Controls)



# Policies and Procedures that Must be in Writing

- Conflict of Interest
- Fraud
- Travel
- Inventory/equipment
- Procurement
- Allowability
- Gratuity
- Cash Management
- Retention of Records

## Why Do We Monitor?

- Opportunity for needed corrections
- Continuous improvement and positive changes
- Recognition

# What is Our Way of Work?

Implementation of a risk-based system that is:

- Based on project risk
- Collaborative in nature;
- Recognizes positive practices;
- Identifies findings and concerns related to program quality and compliance; and,
- Supports systemic and continuous program improvement

## Risk Assessment Factors 2018-19

### Risk Matrix – Operational Risk Factors (Metrics)

- Adult Education Performance Targets\*
- Change in Management Information System (MIS)\*
- Last monitoring review
- Number of grants
- Total amount of agency funding
- Number of grant funds remaining
- Perkins Program Improvement Plan (PIP)
- Audit/monitoring findings
- Change in director

\* Denotes new data element as of spring 2018

## 2018-19 Risk Assessment Process

- Risk score divided into quartiles
- Balanced weight between data elements

Upper Quartile/Higher	7
Upper Middle	5
Lower Middle	3
Lower Quartile	1
Zero	0

# 2018-19 Risk Assessment Process Continued

Calculation of the Risk Score:

- Point Value Assigned X Weight = Total Metric Point
- Sum of all Metric Points = Agency Risk Score

**(Sample) Risk Matrix for Colleges and School Districts Receiving Carl D. Perkins Grants**

**Agency Name: Sunshine State College**

**Target Year: 2016-2017 (Monitoring Year 2018-2019)**

<b>Metric</b>	<b>Scaling</b>	<b>Point Value</b>	<b>Point Value Assigned (PVA)</b>	<b>Weight</b>	<b>Total Metric Points (PVA X Weight)</b>
Number of Years Since the Agency Was Last Monitored	7 or more years	7	5	X 10	50
	5-6 Years	5			
	3-4 Years	3			
	0-2 Years	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	5	X 8	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4+	7	7	X 8	56
	3	5			
	2	3			
	1	1			
3-year Perkins Improvement Plan (PIP) Index	7.50 – 10.00	7	0	X 8	0
	5.00 – 7.49	5			
	2.50 – 4.99	3			
	0<index<2.50	1			
	0	0			
Change in Management Information System (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	X 6	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	1	X 4	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
# OAG Audit Findings	Upper Quartile	7	3	X 4	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>204</b>

**(Sample) Risk Matrix for Colleges and School Districts Receiving Adult Education Grants**

**Agency Name: Sunshine State College**  
**Target Year: 2016-2017 (Monitoring Year 2018-2019)**

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)
Number of Years Since the Agency Was Last Monitored	7 or more years	7	5	X 10	50
	5-6 Years	5			
	3-4 Years	3			
	0-2 Years	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	5	X 8	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4+	7	7	X 8	56
	3	5			
	2	3			
	1	1			
Change in Management Information System (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency Adult Education Program Director Change from Previous Fiscal Year	Yes	7	7	X 6	42
	No	0			
Adult Education Performance Targets	Upper Quartile	7	5	X 4	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	1	X 4	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
# OAG Audit Findings	Upper Quartile	7	3	X 4	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
<b>AGENCY RISK SCORE:</b>					<b>224</b>



# Risk Assessment Process

- 2016-17 grant data was used for risk calculations
- Monitoring will address grants from 2016-17 through 2018-19
- Additional programs in the geographical area may also be reviewed/monitored

## Provider Selection 2018-19

- Agencies with the highest risk score may be targeted for monitoring
- Monitor both CTE and AE
- Various monitoring strategies are implemented

# Quality Assurance

## Spring 2019 targeted providers for on-site monitoring:

- Florida Keys Community College
- Clay County School District
- Florida State College at Jacksonville
- St. Lucie County School District
- Indian River County School District
- Holmes County School District
- Chipola College
- Broward College
- South Tech Charter
- Flagler County School District

# Monitoring Process

- Pre-visit, on-site and post-visit activities
- Records and data reviews (all phases)
- Interviews
  - Phone calls, emails
  - Referrals
- Resolution Plans:
  - Corrective Action Plans (Findings)

## Pre-visit Activities

- Notification (personal and correspondence)
- Webinar training for providers
- Team leader coordination
- Coordination with DOE Team Leader:
  - Confirmation of agency contact (preferably one designee per agency for AE and CTE programs)
  - Coordination and communication with DOE team leader
  - Develop site visit schedule for inventory (onsite)
  - Submit Program of Study Materials as requested

# Information Required

- Organizational chart
- List of administrative staff with duties relevant to these grants; including location and contact numbers
- If available, a map of the district/college indicating locations of program sites
- List of all AE and/or CTE program sites including:
  - Name, address, and zip code
  - Principal/Dean/Director name and phone number
  - Hours of operation
- Agency's list of documents (AE and CTE related) that are required to be contained in a student's record

## On-site Activities

- Entrance Conference – 1 hour maximum
  - Provider presentations optional
  - Discussion of monitoring
- Interviews
  - Administrators
  - Staff/Faculty if needed
- Records Review (2016-17, 2017-18 and 2018-19):
  - Student
  - Finance
  - Personnel
  - Data

## On-site Activities - continued

- Equipment Inventory
  - According to EDGAR specifications – (2016-17 through 2018-19 grants)
  - According to the Uniform Grant Guidance (UGG) –  
The final rule implementing the UGG was published in the Federal Register on December 19, 2014, and became effective for new and continuation awards issued on or after December 26, 2014.
- Perkins Program Improvement Plans (if applicable)
- Programs of Study Conference Call
- Exit conference

## Have Available on the First Day (on-site)...

- Access to records for:
  - FY 2016-17
  - FY 2017-18
  - FY 2018-19
- Policy/handbook for employees
- **PLEASE DO NOT MAKE COPIES!**
- Handbooks and materials for students (include student enrollment packet)
- Attendance policies
- Recruitment efforts
- General policies and procedures
- Governing board and advisory committee(s) related documents (may be a procedures manual)

## First Day - continued

- Recruitment activities and materials for agency's programs
- Financial policies and procedures including those related to purchasing and procurement of contractual services, equipment and supplies
- Travel and purchasing records
- Local data procedures
- An **inventory of equipment** purchased with the grant funds, **by site**
- **Maps** to each AE and/or CTE location
- Staff to alert to our visit:
  - Finance Director
  - MIS Director/Institutional Research
  - Staff involved with the 2016-17 Program of Study
  - Other appropriate administrator(s) or principal(s)
- **P.S. We pay for our own food and drink!**

# Inventory Guidelines

The following elements are required on the inventory of all equipment purchased.

***2 C.F.R. 200, Uniform Grant Guidance, 200.313 Equipment: Property records must be maintained that include:***

- Description of Property
- Serial Number/ID Number
- The source of the funding
- Title Holder
- Acquisition Date
- Cost of Property
- Percentage of Federal Participation
- Location of Property
- Use and Condition of Property
- Sale Price
- Date of Disposal

# Sample Property Inventory List

## SUNSHINE STATE COLLEGE

### Property Inventory List

Serial Number/ ID Number	Description of Property	Source of Funding	Title Holder	Acquisition Date	Cost of Property	Sale Price	Manufacturer	Location of Property/ Room	Date of Disposal
F415661D9HD4	COMPUTER IMAC 27"	ADULT BASIC	JOHN STEWART	05/30/15	\$4,534.21	N/A	APPLE	456	N/A
F45892S3589	6 BURNER GAS RANGE	CARL PERKINS	PAMELA BROWN	08/05/14	\$5,423.54	\$4,562.01	US RANGE GARLAND	125	2/15/2016
S6D3356V23	WARMING CABINET	CARL PERKINS	MARIE OLIVER	05/18/15	\$245.21	N/A	VULCAN	124	N/A
FG541S226	STORAGE CABINET	ADULT BASIC	STEPHEN GRAY	06/24/15	\$4,587.23	\$1,542.25	GMI	163	N/A
F5G65623SD	DRONE HELICOPTER	ADULT BASIC	LYLE GOLDEN	06/08/16	\$451.24	N/A	DJI	214	N/A
465.54L56	COMPUTER IMAC 27"	CARL PERKINS	JAMES HARRIS	08/07/13	\$5,685.51	N/A	APPLE	321	5/30/2015
298556	TABLE W/ WHEELS	CARL PERKINS	MICHAEL JONES	10/15/13	\$4,876.55	\$3,453.25	EAGLE GROUP	325	12/7/2015
5545600	WORKING TABLE	ADULT BASIC	ELIZABETH REYS	12/07/15	\$8,756.25	N/A	EAGLE GROUP	323	N/A
NONE	PRINTER	ADULT BASIC	JASON BORNE	03/10/15	\$5,543.14	N/A	HP	154	N/A
UHKJ554521	MOBILE LAB CHART	CARL PERKINS	VALERIE HODGE	09/21/15	\$5,463.24	N/A	SPECTRUM	245	6/22/2016
NONE	COMPUTER IMAC 27"	ADULT BASIC	MELINDA JONES	11/24/15	\$5,513.15	N/A	APPLE	186	N/A
87456.45.456	DEEP FRYER	CARL PERKINS	HAROLD WHITE	09/24/13	\$2,685.00	\$745.25	PITCO	152	4/24/2016



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# Program of Study

Bruce Harrington

## Program of Study Conference Call

- POS Conference call conducted first day of visit
- Conducted by staff of the Federal and State Initiatives (FSI) section of the DCAE
- Prior to call, all relevant agencies will complete the Program of Study section of the protocol and return to your team leader, based on 2016-17 primary POS
- Email sent prior to visit outlining materials needed and suggested stakeholders to be present on call

# Program of Study Conference Call

## Background Materials for Call

- Copy of Program of Study (POS) Form outlining pathway for students to move from secondary to postsecondary and into the workforce from the 2016-17 Perkins RFA
- Copy of Local Articulation Agreements for this POS
- Responses to Program of Study narrative section of monitoring protocol
- Other materials as requested to validate POS

# Program of Study Conference Call

## Purpose of Call

- Review aspects of the agency's primary 2016-17 Program of Study (POS) from that year to present
- Address questions or need for further information based on submitted responses to POS narrative section of monitoring protocol
- By discussing this particular POS, also hope to gain an understanding of the processes in place at your agency for identification, development, implementation and review of your POS

# FSI Program of Study Team Members

Bruce Harrington, Director  
Federal and State Initiatives (FSI)  
850-245-0949

Cathy Hammond  
Heather Conley  
Lee Chipps-Walton



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# Post-visit Activities

Tashi Williams

## Post-visit Activities

- Thank you letters & evaluation survey
- Monitoring Report
  - Preliminary Draft – sent to director for feedback
  - Final Report – sent to agency head and director
- Resolution activities
  - Corrective Action Plan – for Findings
  - Follow-up communication
- Closure letter

# Monitoring Report

## Areas of Focus:

- Administration
- Data
- Curriculum and Instruction
- Financial
- Records Review
- Programs of Study
- Technology and Equipment
- Collaboration

# Common Findings Discovered While Conducting Onsite Monitoring Visits

- Failure to accurately report student data to FDOE: UGG 2 CFR 200.328 Monitoring and reporting program performance, F.S. 1008.43 Career program reporting requirements
  - Students awarded occupational completion points (OCP) and literary completion points (LCP) gains without the necessary student test scores or completed coursework.
  - Students erroneously awarded industry certifications that could lead to unearned CAPE funding.
- Testing administrators (TABE and CASAS) not adhering to certification/recertification requirements set forth by law and FDOE:WIOA Section 231(e)(9) Qualified instructors and staff, 2016-2017 Florida Adult Education Assessment Technical Assistance Paper, F.A.C. 6A-10.042 Maintenance of test security, F.S. 1008.24 Test administration and security

## Common Findings, continued

- Property inventory findings

Authority/Law: 2 C.F.R. 200, Uniform Grant Guidance, 200.313  
Equipment and EDGAR, Section 80.32 Equipment, (d) (1)

- Incomplete or lack of inventory for equipment
- Property not properly tagged
- Lack of procedures for properly disposing certain inventory items

- Procurement findings

Authority/Law: 34 CFR 80.36(b) – Procurement Standards

- Lack of policies and procedures for contracting and/or purchasing goods and services
- Unauthorized purchases made against the federal grant
  - Spending federal grant dollars prior to approval of requested grant amendments
  - Spending federal grant dollars **WITHOUT** approval of requested grant amendments



## Common Findings, continued

- Inadequate data quality/reporting findings  
Authority/Law: Proviso language in the annual General Appropriations Act Workforce Education, Aid to Local Governments Workforce Development from General Revenue Fund
  - Lack of timely and accurate reporting of Workforce Development Information System (WDIS) data
  - Over-reporting of instructional hours
- Student records findings  
Authority/Law: The Family Educational Rights and Privacy Act (FERPA)(34 Code of Federal Regulations (CFR) Part 99.31
  - Student records were not accessible to compliance team

## Common Concerns

- Last minute spending...students must benefit
- No staff development plans
- No leadership succession plans
- Lack of coordination among MIS/data, program and financial professionals
- Outdated policies and procedures
- Lack of attention to off-site location resource needs

# Common Best Practices Discovered in Onsite Monitoring Visits to Agencies

- Innovative uses of technology
- Continued collaboration with business and industry
- Integration of academics with career themed curriculum
- Effective use of advisory boards
- Effective communication between administrative, program and support staff

# Monitoring Reports

- Monitoring reports are available online:

<http://fldoe.org/academics/career-adult-edu/compliance>

## Tools and Resources

- Carl D. Perkins Career and Technical Education Improvement Act of 2006

[http://fldoe.org/core/fileparse.php/3/urlt/perkins\\_iv\\_text.pdf](http://fldoe.org/core/fileparse.php/3/urlt/perkins_iv_text.pdf)

- Workforce Innovation and Opportunity Act of 2014

<http://www.doleta.gov/WIOA/>

- Education Department General Administrative Requirements (EDGAR)

<http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html>

## Tools and Resources - continued

- Federal Uniform Grant Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards)

<https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>

- Florida Department of Education, Quality Assurance and Compliance

<http://fldoe.org/academics/career-adult-edu/compliance>

- Florida Department of Education “Green Book”

<http://www.fldoe.org/finance/contracts-grants-procurement/grants-management>

# Quality Assurance and Compliance Team

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Rod Duckworth, Chancellor

Division of Career and Adult Education

Gloria Spradley-Brown, Chief

Bureau of Grants Administration and Compliance

## [ Q & A ]

We welcome your comments,  
feedback, and suggestions  
Thank you!



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