

Department of Education
Office of the Inspector General – Internal Audit
Twelve-Month Status Report on: Apprenticeship Program
Report # A-2021DOE-009 Issued: November 10, 2021
Status as of November 10, 2022

Finding	Recommendation(s)	Previous Management Responses	Management Response as of November 10, 2022	Anticipated Completion Date & Contact
<p>The State Apprenticeship Advisory Council (SAAC) is not in compliance with the requirements outlined in CFR 29 Part 29, in regard to the committee members currently serving and the frequency of the SAAC meetings</p>	<p>We recommend DCAE continue to seek to fill all positions in accordance with the Code of Federal Regulations and the Florida Statutes and document its efforts. We additionally recommend the SAAC resume meeting bi-annually and maintain publicly available minutes of each meeting in accordance with the Code of Federal Regulations.</p>	<p>Management Response as of November 10, 2021</p> <p>Concur. The Department will continue to work with the Executive Office of the Governor to support the appointment of the 10 voting members required for the SAAC. As soon as the appointments are made, the Bureau Chief for Standards, Benchmarks and Frameworks will convene the SAAC and host a subsequent meeting with the general counsel’s office to conduct training on Florida sunshine laws.</p> <p>All meetings will be publicly noticed in the Florida Administrative Weekly. In addition, all registered Apprenticeship programs will be notified of the scheduled meeting.</p>	<p><i>The corrective action for this finding has been completed and we believe this finding has been resolved. On June 14, 2022, the SAAC was convened with the 8 council members. The meeting was held at Marchman Technical College in New Port Richey. A quorum was present.</i></p> <p><i>The remaining 2 gubernatorial appointments to the SAAC were announced on August 5, 2022.</i></p> <p><i>A meeting with the full newly appointed council will convene on Thursday, November</i></p>	<p><i>Completed</i></p>

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		<p>The anticipated completion date is February 2022.</p> <p>Management Response as of May 10, 2022</p> <p>Gubernatorial appointments to the SAAC were announced on April 29, 2022. 8 of the 10 voting seats have been appointed and 2 appointments (1 joint representative and 1 non-joint representative) are pending. The interim commissioner approved Chancellor Kevin O’Farrell to serve as designee and chairperson of the SAAC.</p> <p>In February 2022, the SAAC was convened with the existing members that continued to serve past their term. The meeting was held at Lively Technical College</p>	<p><i>17, 2022 at Orange Technical College. A notice for publication in the Florida Administrative Register was submitted on 10/13/22 and is scheduled to post on 11/3/22.</i></p> <p><i>All registered programs were notified of the upcoming meeting through a memo sent by Chancellor O’Farrell on October 17, 2022.</i></p> <p><i>Details on the SAAC including the upcoming agenda, meeting archive and members may be found through the following website:</i></p>	

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		<p>in Tallahassee. A quorum was not present.</p> <p><i>Anticipated Completion Date & Contact</i></p> <p>The reconstituted SAAC will be convened late spring/summer 2022. Anticipated completion is August 1, 2022.</p> <p>Contacts: Kathryn Wheeler, Director of Office of Apprenticeship Kathleen Taylor Bureau Chief</p>	<p>https://www.fldoe.org/academics/career-adult-edu/apprenticeship-programs/state-apprenticeship-advisory-council/.</p>	
<p>The Apprenticeship Section did not conduct Provisional Quality Assurance Assessments and Quality Assurance Assessments at the frequency outlined in</p>	<p>We recommend the Apprenticeship Section conduct Provisional Quality Assurance Assessments and subsequent Quality Assurance Assessments in a timely manner as required in the Code of Federal Regulations. To assist the section in ensuring the timeliness of assessments, the section should</p>	<p>Management Response as of November 10, 2021</p> <p>Concur. The Office of Apprenticeship (OA) (located in the Division’s Bureau of Standards, Benchmarks and Frameworks) will conduct the following steps to achieve full</p>	<p><i>The corrective action for this finding has been completed and we believe this finding has been resolved. USDOL provided initial training to the Florida Office of Apprenticeship on June</i></p>	<p><i>Completed</i></p>

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<p>Title 29 CFR §29 and §30.</p>	<p>develop an internal log to track quality assurance activities. The log, at minimum, should include all the registered programs, date of registration, length of training cycle, date of the completed PQAA, date of the last completed QAA, date of the completed EEO Compliance Reviews, and the next QAA due date. This practice would allow for continuity of work if there is a change in personnel. We additionally recommended the Apprenticeship Section conduct a comprehensive assessment of their programs to document the dates of the last completed assurance reviews and ensure quality assessments are conducted in the timeframes required by the CFR.</p> <p>We recommend the department ensure the documentation of assurance and compliance reviews</p>	<p>compliance with both the Code of Federal Regulation and State Board of Education rule:</p> <ol style="list-style-type: none"> 1. Build master PQAA and QAA tracking system that contains the fields recommended by the IG’s office. The target completion date is December 15, 2022. 2. Prioritize the immediate scheduling of overdue PQAA and QAAs of any registered program in conjunction with Apprenticeship Training Representatives with a tentative target completion of March 31, 2022 for any overdue program. Of the programs overdue for either a PQAA or QAA, 	<p>23, 2022. <i>Subsequent trainings will take place in the coming months.</i></p> <p><i>USDOL OA has modified the structure of program reviews to include the following updates:</i></p> <ol style="list-style-type: none"> 1. <i>The Apprenticeship Program Review (APR) combines the former Quality Assurance (QAA) and parts of the EEO Compliance Review.</i> 	

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	<p>submitted to headquarters is consistent, as this serves as the program’s official file. The quality assurance assessment file maintained at the department should, at minimum, include a copy of the RAPIDS entry page; the Apprenticeship Program Quality Assessment form, the QAA-Final outcome letter, and documentation of any required follow-up. The records for EEO Compliance Review, at minimum, should contain the EEO checklist, the completed EEO Compliance Review Guide, and a final outcome letter, if separate from the QAA-Final Outcome Letter. Additionally, we recommend the Apprenticeship Section update the ATR manual to require the ATR’s to submit assessment documents to the department.</p>	<p>programs with registered apprentices will be scheduled first followed by overdue programs that do not have registered apprentices.</p> <p>In addition, the OA will document revised processes in the ATR manual and will develop a separate training guide on the PGAA and QAAs. Furthermore, the Bureau Chief is requesting that USDOL Regional 3 representatives provide a comprehensive training to the team in early 2022 on PQAA and QAA best practices.</p> <p>Management Response as of May 10, 2022</p> <p>The corrective action for this finding is still pending. The master PGAA and QAA tracker is</p>	<p>2. <i>For programs with 5+ apprentices subject to developing an Affirmative Action Program (AAP), an Extended Apprenticeship Program Review (EAPR) is utilized.</i></p> <p><i>The FDOE Office of Apprenticeship has developed a Master Review Tracker. This tracker indicates the dates of previously completed Provisional Quality Assurance Assessment (PQAA), Quality Assurance</i></p>	

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		<p>in development. All programs, dates of initial registration, term of apprenticeship (aka length of training cycle) for each associated occupation have been placed in the draft workbook. Content specific to PQAAs/QAAs have not yet been populated.</p> <p>USDOL OA released new guidance related to the QAA system in December 2021 and OA has communicated with the new apprenticeship director and will organize a 3-day virtual training for the entire state apprenticeship staff to take place in June 2022</p> <p>Upon completion of the training, the internal ATR manual will be updated, and the tracker will be completed, and this function will become centralized and become the responsibility of headquarters.</p>	<p><i>(QAA) and EEO Compliance Reviews. The tracker indicates the date of future review and specifies the type of review that will occur (Provisional, APR or EAPR). Programs with active apprentices that are overdue for review have been prioritized in the Master Review Tracker with tentative deadlines based on length of time since review deadline, and if the program is due for a provisional review. Programs that have not had active apprentices over the course of a year will be cancelled per Rule 6A-</i></p>	

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		<p>Furthermore, a schedule of PQAAs and QAAs utilizing the new manual and templates will be executed. A new director was hired in February 2022 to carry out the tasks associated with this finding with support from the Bureau Chief.</p> <p>A digital quality assurance assessment file that contains the elements identified in the finding will be maintained by the department and archived in the federal RAPIDS system.</p> <p><i>Anticipated Completion Date & Contact</i> Anticipated completion is November 1, 2022 to accommodate the director who will be taking maternity leave in July, August and September of 2022.</p>	<p><i>23.003(11), F.A.C. These are followed by overdue program reviews without active apprentices.</i></p> <p><i>The internal Apprenticeship Book has been updated to reference the Master Review Tracker (page 63).</i></p> <p><i>The FDOE Office of Apprenticeship is interested in moving toward a risk-based monitoring system, as this has been championed by other states as a best practice. The USDOL Office of Apprenticeship (OA)</i></p>	

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		Contacts: Kathryn Wheeler, Director of Office of Apprenticeship Kathleen Taylor Bureau Chief	<i>has inquired if states are moving toward risk-based compliance reviews and has encouraged states to do so. We have indicated with OA that we are interested in partnering with them in the development of risk-based compliance monitoring. Factors to consider for inclusion in the risk matrix will include length of time since last review, changes in leadership, signs of inconsistency in registering or completing apprentices, significant change in the number of participating employers, and limited</i>	

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			<p><i>or no program activity or excessive activity.</i></p> <p><i>As the FDOE develops the risk-based monitoring system, the Master Review Tracker will be updated to reflect the risk-based prioritization of program reviews.</i></p>	