

Department of Education
Office of Inspector General – Internal Audit
Twelve-Month Status Report on: Bureau of Family and Community Outreach–21st Century Community Learning Center Grants
Report #A-2122DOE-019 Issued: September 22, 2023
Status as of November 8, 2024

Finding	Recommendation(s)	Previous Management Responses	Management Response as of November 8, 2024	Anticipated Completion Date & Contact
<p>Some OASAS deliverable submissions did not include all required reporting elements, and BFCO approved invoices for payment despite the missing deliverables.</p>	<p>We recommend that BFCO work with OASAS and the Orange County Public School District to ensure data necessary to comply with all deliverable reporting requirements is available to OASAS for future grant periods. We further recommend that BFCO reviews all submitted deliverables in accordance with the Monitoring and Compliance Unit Standard Operating Procedures and ensures all deliverables are satisfactorily completed prior to authorizing payment.</p>	<p>Management Response as of September 22, 2023</p> <p>BFCO concurs with the finding. BFCO will remove the requirement of submission of progress report grades from its subrecipients as a requirement for deliverable approval. Report card grades will serve as the continuous improvement indicator for academic performance.</p> <p>Regarding behavioral data collection, BFCO will modify its requirements to include special conditions for subrecipients whose school districts do not provide monthly behavioral data. BFCO will require that the subrecipient must provide a letter on letterhead from the school district that indicates the time frames for which their behavioral data is</p>	<p><i>The previous response on March 22, 2024, marked the resolution of this finding. Completed – October 2023</i></p> <p><i>The previous response on March 22, 2024, marked the resolution of this finding. Completed – August 2023</i></p> <p><i>2024-25 Special Conditions folder was created on the T: drive to collect forms and additional documentation as needed. Completed – August 2024</i></p> <p><i>1. The previous response on March 22, 2024, marked the resolution of this finding. Completed – August 2023</i></p>	<p><i>Contact Contobia Adams</i></p>

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		<p>released. Subrecipients who provide evidence that the school district of the target school which they serve does not provide monthly behavioral data, will receive special conditions for the months for which this data is not available.</p> <p>1. BFCO will ensure that all the required deliverables are provided by OCPS and are accepted prior to payment. Deliverables must be quantifiable, measurable, and verifiable. Each deliverable must be directly related to a task specified in the scope of work and must identify the minimum level of service to be performed.</p> <p>2. BFCO Program Staff will review all the required deliverables prior to authorizing payment.</p> <p>3. BFCO supervisors will conduct regular sample reviews of</p>	<p>2. <i>The previous response on March 22, 2024, marked the resolution of this finding. Completed – August 2023</i></p> <p>3. <i>The revised SOPs for PSU include quality assurance sampling. The responsibilities for the Program Document Review are shared between PSU and MCU, and the SOPs for each unit align. Completed – September 2024</i></p> <p>4. <i>The revised SOPs for PSU, supplemented by new Deliverables Guidance, detail each month’s requirements and process methodology. Completed – September 2024</i></p>	

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		<p>deliverables which have been approved by BFCO staff to ensure all criteria for the deliverables are being met. Additionally, BFCO will conduct regular training with staff to ensure there is a clear understanding of deliverable requirements needed for approval.</p> <p>4. BFCO will ensure that all submitted deliverables are reviewed in accordance with the Monitoring and Compliance Unit Standard Operating Procedures as well as the Program Support Unit Standard Operating Procedures. BFCO will also ensure that all deliverables are satisfactorily completed prior to authorizing payments.</p> <p><i>Anticipated Completion Date</i> The anticipated completion date is October 31, 2023.</p>		

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		<p>Management Response as of March 22, 2024</p> <p>BFCO removed the requirement of submission of progress report grades from its subrecipients as a requirement for deliverable approval. Report card grades are now used as a continuous improvement indicator for academic performance. This was communicated to all subrecipients during the 21st CCLC Fall Technical Assistance meeting on October 3 and 4, 2023, in the Evaluation and 21APR Data presentation.</p> <p>BFCO staff has communicated special conditions to subrecipients whose districts provide data on a quarterly basis and has collected supporting documentation from subrecipients.</p>		

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		<p>BFCO will create a program folder for subrecipients requiring special conditions related to monthly deliverables.</p> <ol style="list-style-type: none"> 1. BFCO ensures that all required deliverables from OCPS are reviewed and approved prior to payment. 2. BFCO Program Staff reviews all required deliverables for final approval prior to authorizing payment. 3. BFCO supervisors are updating written Program Support Unit (PSU) standard operating procedures (SOP) that align with the Monitoring and Compliance Unit (MCU) SOP to include quality assurance sampling. BFCO supervisors conduct training to 		

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		<p>ensure there is a clear understanding of deliverable requirements needed for approval.</p> <p>4. BFCO supervisors are updating the written PSU SOP to ensure that all submitted deliverables are reviewed in accordance with grant requirements.</p> <p><i>Anticipated Completion Date</i> The anticipated completion date is September 2024.</p>		
<p>The selected subrecipients did not submit all deliverables in a timely manner.</p>	<p>We recommend BFCO ensures that subrecipients submit all required deliverables timely and send reminders until they receive all required documentation. We also recommend that BFCO define the “participant data update” deliverable as behavioral</p>	<p>Management Response as of September 22, 2023</p> <p>BFCO concurs with the finding.</p> <p>1. BFCO has implemented a tiered internal and subrecipient checks and balances review process to support timely deliverables.</p>	<p>1. <i>The revised SOPs for PSU include quality assurance sampling. Completed – September 2024</i></p> <p>2. <i>The revised SOPs for PSU, supplemented by new Deliverables Guidance and Deliverables Email Templates, include specific</i></p>	<p>Contact Contobia Adams</p>

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	<p>referrals and in-school suspensions in the RFA and add the quarterly report card grades deliverable and the associated due dates in the RFA.</p>	<p>2. BFCO will remind subrecipients regarding financial consequences as outlined in the Request for Application (RFA) or Request for Proposal (RFP) if deliverables were not submitted by the deadline established by FDOE.</p> <p>3. Moving forward, BFCO will specify the “participant data update” deliverable reporting element in the RFA and RFP.</p> <p><i>Anticipated Completion Date</i> The anticipated completion date is September 30, 2023.</p> <p>Management Response as of March 22, 2024</p> <p>1. BFCO supervisors are updating written PSU SOP to include quality assurance sampling.</p>	<p><i>guidance for notifying programs about potential financial consequences.</i> <i>Completed – September 2024</i></p> <p>3. <i>BFCO has successfully launched the 2024-2025 RFA RFP which included the participant data update in the Project Performance Accountability Section of the RFP. Evidence verification is listed as all subrecipients must submit via the department’s online system-monthly. Completed – April 2024</i></p>	

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		<p>2. BFCO staff continue to remind subrecipients who are out of compliance about potential financial consequences for not meeting grant requirement deadlines, as outlined in their RFA and RFP.</p> <p>3. BFCO updated the participant data information in the upcoming 2024-25 RFP and the Program Office will disseminate this information to continuing subrecipients at the beginning of the new grant year.</p> <p><i>Anticipated Completion Date</i> The anticipated completion date is September 2024.</p>		

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<p>BFCO did not always approve deliverables in a timely manner.</p>	<p>We recommend BFCO enhance its controls, including supervisory review of deliverable approval dates, to ensure staff reviews deliverables within the time frame outlined by the grant terms.</p>	<p>Management Response as of September 22, 2023</p> <p>BFCO concurs with the finding. BFCO will update its policies and procedures to include frequent supervisory review of deliverable due dates and provide regular training for staff regarding the process and requirements of deliverables approval.</p> <p><i>Anticipated Completion Date</i> The anticipated completion date is October 31, 2023.</p> <p>Management Response as of March 22, 2024</p> <p>BFCO supervisors are updating the written PSU SOP to ensure all submitted deliverables are reviewed in a timely manner. The SOP will address frequent supervisory review of deliverable due dates and regular training for staff regarding the process and</p>	<p><i>The revised SOPs for PSU include quality assurance sampling. SOPs and guidance documents are updated yearly, followed by staff-wide training. Completed – September 2024</i></p> <p><i>Also, the onboarding process for new hires includes training on the process and requirements of deliverables approval. Completed – September 2024</i></p>	<p><i>Contact Contobia Adams</i></p>
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		requirements of deliverables approval. <i>Anticipated Completion Date</i> The anticipated completion date is September 2024.		
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