



FLORIDA DEPARTMENT OF  
**EDUCATION**  
CAREER AND ADULT EDUCATION

## **Quality Assurance and Compliance**

**Virtual Desk Monitoring Review  
for  
Pathways to Career Opportunities Grant**

**TruMont, LLC**

**November 2024  
Final Report**

## TABLE OF CONTENTS

I.	Introduction .....	1
II.	Authority .....	1
III.	QAC Core Monitoring Guide.....	1
IV.	Provider Selection .....	1
V.	TruMont .....	2
VI.	Monitoring Activities .....	2
VII.	Observation .....	3
VIII.	Results .....	6
IX.	Summary .....	6

Florida Department of Education  
Division of Career and Adult Education

**TruMont**  
**Pathways to Career Opportunities Grant (PCOG)**  
**Quality Assurance and Compliance Monitoring Report**

**I. INTRODUCTION**

The Division of Career and Adult Education (Division) within the Florida Department of Education (Department) has several key responsibilities, including leadership, resource allocation, technical assistance, monitoring and evaluation. These duties require the Division to oversee the performance and regulatory compliance of federal and state funding recipients. The Quality Assurance and Compliance (QAC) office plays a critical role in this process by designing, developing, implementing and evaluating a comprehensive quality assurance system, which includes monitoring. This system aims to ensure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is the Division's duty to regularly monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

**II. AUTHORITY**

Pursuant to Section 1008.32, Florida Statutes, Rule 6A-20.046, Florida Administrative Code, the PCOG Request for Proposal and the Uniform Grant Guidance, also referred to as 2 Code of Federal Regulations Part 200, the Department is responsible for monitoring programs run by a sub-grantee or provider of supported activities to ensure adherence to relevant federal and state regulations.

**III. QAC CORE MONITORING GUIDE**

The Core Monitoring Guide is designed to be utilized by any reviewer who is conducting an onsite or desk monitoring of any program currently administered by the Division. The guide includes a brief overview of each aspect of the monitoring design and the process, as well as objectives that can be used when agencies are monitored or reviewed. The guide is located on the Division's website at <http://fldoe.org/academics/career-adult-edu/compliance>

**IV. PROVIDER SELECTION**

The QAC office may apply any specific monitoring strategy to any federal or state-funded provider at any time. There may be circumstances that may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

The TruMont monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Dr. Lynn Peoples, Co-founder, on August 16, 2024. The designated representative for the agency was also Dr. Peoples.

**V. TruMont**

**Finance**

The provider was awarded the following grant(s) for the fiscal years (FY) 2020-22; 2021-23 and 2022-23:

**FY 2020-22**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	97N-90310-1D301	\$ 351,488.00	\$ 61.28

**FY 2021-23**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	97N-90310-2D401	\$ 624,200.00	\$ 0.00
	97N-90301-2D402	\$ 303,417.00	\$ 0.00

**FY 2022-23**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	97N-90301-3Q501	\$ 471,758.00	\$ 117,939.00
	97N-90301-3Q502	\$ 363,771.00	\$ 0.00

Additional information about the provider may be found at the following web address:

<https://www.trumont.org>

**VI. MONITORING ACTIVITIES**

The monitoring activities include pre- and post-review planning, an entrance and exit conference, records review and interviews with administrators, if necessary.

**Onsite Visits**

- No onsite visits were conducted as part of the monitoring review.

**Entrance and Exit Conferences**

An introductory pre-visit meeting was conducted on September 19, 2024. The participants are listed below: TruMont was provided with email correspondence regarding the outcome of their monitoring review.

<b>Name</b>	<b>Title</b>	<b>Entrance Conference</b>	<b>Exit Conference</b>
Lynn Peoples	Co-founder, TruMont	X	X
Nina Perez	Co-founder, TruMont	X	
Morgan Peoples	Chief Operating Officer, TruMont	X	
<b>Division Monitoring Team</b>			
Michael Swift	Program Specialist, QAC	X	X
Chuck Davis	Program Specialist, QAC	X	

**Interviews**

Aside from the introductory pre-visit meeting, no interviews were necessary as part of the monitoring review.

## Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, part F. In addition, policies and procedures were examined and discussed at various times during the monitoring review. Additionally, the Division's Research and Evaluation team requested that the monitoring team lead verify PCOG enrollees. All enrollment numbers were provided by TruMont.

## **VII. OBSERVATION**

- A. ADMINISTRATION** refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
- The PCOG-sponsored registered apprenticeship program is managed and supervised by two chief nurses who founded TruMont in 2018. Between the two, they have worked and/or consulted with over 75 hospitals and healthcare systems across the country. The two possess over 50 years of nursing and healthcare experience.
  - To accomplish the goals and scope of the PCOG grant(s), TruMont assembled an expert group of experienced nurses, educators, practicing nurses and instructional design professionals from around the country to create programs that address the most pressing workforce issues in nursing.
  - As an institution, TruMont has been training apprentices and providing Related Technical Instruction (RTI) for apprentices since 2020.
  - Deliverables are submitted to the Division on time and grant amendments are submitted with minimal errors. Deliverables are typically paid at full value.
  - The grant coordinator works alongside the Chief Financial Officer (CFO) and the Finance Director to ensure all aspects of their grant(s) are adhered to in accordance with the terms and conditions of the award. This includes financial management and programmatic management of the grant(s).
- B. DATA AND ASSESSMENT** refers to all the data and assessment system components, including test administration, test security, data collection, entry, reporting and procedures. The use of data in program decision-making is also explored and commented on.
- The Division's Data, Research and Evaluation team requested that the monitoring staff confirm TruMont's PCOG enrollment numbers submitted to the state reporting database. Enrollment data was requested for the following occupations:
    - Registered Nurse
    - Home Health Aide
  - TruMont provided sufficient enrollment data and documentation as required by the Department.
  - All documentation was provided by TruMont as part of the monitoring review.
- C. CURRICULUM AND INSTRUCTION** refers to elements contributing to student learning and skill acquisition.
- TruMont utilization of its state PCOG award(s) were used to expand their pre-existing Registered Nursing (RN) apprenticeship program. The programs extend through 13 different clinics within Polk, Hillsborough, Pinellas, Broward and Miami-Dade counties.
  - TruMont is the apprenticeship partner, as well as the RTI provider. The RN program consists of 151 hours of RTI and 2080 hours of practical on the job learning.
  - Each employer that works with TruMont is able to tailor the educational materials and instruction to fit their clinic's unique specialties. TruMont Faculty Coaches are the instructors

that work closely with each employer's Onsite Coordinator to manage and individualize each student's apprenticeship experience.

- Additionally, the apprenticeship program incorporates a unique and innovative learning platform that includes real-time grading, immediate feedback and the tracking of each student's individual trends within the classroom and clinical settings. All students are assigned a Faculty Coach that is responsible for their advancement and success within the program. This individual serves as the student's mentor throughout the duration of the program.
- TruMont prides itself on the recruitment and retention of underserved and underrepresented populations including low-income, veterans and single mothers. They work with local Career Source providers to sort out targeted demographics within the service region.

**D. TECHNOLOGY AND EQUIPMENT** refer to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.

- For the years monitored, TruMont did not utilize state grant funds to purchase any equipment that met the capitalized threshold of \$5,000. Additionally, no items were purchased that cost more than \$1,000. No inventory review was required.
- Despite not purchasing any capitalized equipment, TruMont has policies and procedures on property control and management, equipment safety/storage, inventory reconciliation and inventory disposal. In addition to these policies and procedures, TruMont has internal controls and procedures to manage property acquisition and disposal/surplus of equipment that has reached its maximum useful life.
- TruMont and their partner employers must maintain all inventory (despite value) at a given location. The finance department provides each partner with an inventory list of all assets at their location and are expected to be responsible for everything on the list.
- A Fixed Asset Acquisition form is required any time a new piece of equipment is purchased. The form is submitted to the accounts payable department accompanied by the purchase order and approved invoice for payment.
- TruMont reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.

**E. RECORDS REVIEW** refers to reviewing the records and documents supporting compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.

**Documents reviewed were:**

- Policies and procedures for financial reporting
- Policies and procedures for time and effort
- Policies and procedures for property accounting and management
- Memorandum of Understanding with external employers
- Final Project Disbursement Report
- Grant Budget Analysis
- PCOG performance outcome forms
- Apprenticeship activity reports
- Procurement records – all items less than \$1,000.
- Quarterly deliverables

F. **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.

- QuickBooks® is used as TruMont’s financial management system. Purchases, contracts, deliverables and all aspects of fiscal management are housed within the system.
- TruMont does not pay salaried positions with grant funds but does support numerous contractual agreements with PCOG funding. Despite not having any salaried positions paid for by the grant, policies and procedures on time and effort were provided.
- Contractors support apprenticeship objectives and provide services as proposed in their grant(s). Contracts include academic services, professional services and advisory and informational services. TruMont provided multiple examples of contractual agreements as part of the monitoring review.
- TruMont does not employ a dedicated contract manager. It is the responsibility of the compliance contractor and grant coordinator to ensure all phases and deliverables of any contract are adhered to.
- TruMont has policies and procedures for financial and fiscal reporting that ensure accuracy and conformity with Generally Accepted Accounting Principles. As recipients of state funds, they comply with the Office of Management and Budget Uniform Administrative requirements. The following components of their financial policies and procedures manual were reviewed as part of the monitoring process:
  - Purchasing guidelines and procedures
  - Sole source purchases
  - Time and effort
  - Contract Management
  - Management of fixed assets
  - Procurement
  - Travel
- It is the responsibility of the CFO to approve all purchases and negotiate any high dollar items that require bids and/or quotes prior to acquisition. All purchases above \$3,000 require a competitive bidding process.
- Project managers routinely review their grant budgets to keep track of current expenditures and to ensure that there is no cost overrun between object codes. If the scope of a project changes or if funds need to be re-allocated, an amendment will be drafted and submitted to the Division.
- All supplies, equipment and services charged to a grant-funded source shall be purchased using sound judgement and obtained at the lowest cost possible. Expenditures must go toward the operation of programs and fit within the scope of the grant.
- No purchases shall be authorized without prior approval from the Division via a grant award letter and/or subsequent amendment(s). Even after approval from the Division, the CEO and CFO must approve all expenditures.
- TruMont provided additional fiscal records such as:
  - Contractual agreements and deliverables
  - Procurement
  - TravelAll records were in accordance with applicable local, state and federal law.
- QAC monitoring staff conducted a fiscal review of the providers’ grant budget analysis (GBA). All object codes and dollar amounts pre-approved on their grant award were adhered to.

**G.** **COLLABORATION** refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.

- TruMont has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within their service area. The list of partners includes, but is not limited to:
  - Hillsborough County
  - Miami-Dade County
  - Broward County
  - Pinellas County
  - Polk County
  - CareerSource partners within their various service regions

## **VIII. RESULTS**

TruMont was not found to be out of compliance.

## **IX. SUMMARY**

After completing the monitoring review and receiving any additional information requested, a preliminary report is sent to the provider for their review. The Division monitoring team lead may consider comments at their discretion. Once the final report is approved, it will be sent to the agency head and a copy will be sent to the provider's designated contact person. The final report will also be posted on the Department's website, which you can find at:

<https://www.fldoe.org/academics/career-adult-edu/>

Once all outstanding corrective action plan items have been completed (when applicable), the Division will issue a closure letter to the agency head and designated contact person. This letter will signify the end of the monitoring process and that no further action is required.

The monitoring team would like to extend their appreciation to all participants in the TruMont monitoring review, on behalf of the Division. A special thanks is offered to Dr. Lynn Peoples for her participation and leadership during this process.





**Please address inquiries regarding this report to:**

**Kara Kearce**  
**Director of Quality Assurance and Compliance**  
**Kara.Kearce@fldoe.org**  
**(850) 245-9033**

**Florida Department of Education**  
**Division of Career, Technical and Adult Education**  
**325 West Gaines Street · Room 722A**  
**Tallahassee, Florida 32399**

