

## Quality Assurance and Compliance Onsite Monitoring





### Fall 2015 Provider Training Webinar

August 13, 2015

10:00 AM - 12:00 PM (EST)

Webinar registration link: <a href="https://www.gotomeeting.com/webinar/homepage">www.gotomeeting.com/webinar/homepage</a>

Call number: 1-888-670-3525

Participant Access Code: 4632608161 then press #



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- 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 to mute and press \*6 to unmute.



#### **FACILITATOR**

## Tashi Williams, Compliance Director



Quality Assurance and Compliance Section Division of Career and Adult Education 850-245-9033



## **Objectives of Conference Call**

# To provide participants with information regarding grant program monitoring scheduled for Fiscal Year 2015-16





## **Fiscal Years and Programs Monitored**

- Fiscal Years (FY) monitored:
  - o 2013-14, 2014-15 and 2015-16
- Grant Programs to be monitored:
  - Adult Education (AE)
  - Carl D. Perkins (CTE)



## Topics to be covered on the Call

- Why do we monitor and what is our way of work?
- Enhancements to the Risk Assessment
- How do we select agencies to monitor?
- Agencies selected for fall 2015 onsite monitoring
- Monitoring strategies and areas of focus
- Pre-visit, on-site, and post-visit activities
- Items to have available for visit
- Post-visit monitoring report
- Examples of findings and concerns found in onsite monitoring
- Team introduction
- General Q & A



## **Quality Assurance and Compliance Team**

Dr. Shahrokh Massoudi



Joycelyn Brinson



Donna Waller



Michael Swift





## Why do we monitor?

- Federal and state requirement
- Accountability program and fiscal
- Opportunity for needed corrections
- Continuous improvement and positive changes
- Recognition



## What is Our Way of Work?

- Is based on project risk
- Is collaborative
- Recognizes positive practices
- Identifies and communicates findings and concerns
- Supports continuous program improvement



## **Quality Assurance**

#### **Vision**

Implementation of a risk-based system that is:

- 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 2015-16**

## Risk Matrix – Operational Risk Factors (Metrics)

- Number of grants
- Total amount of agency funding
- Number of grant funds remaining
- Program Improvement Plan (PIP)\*
- Audit/monitoring findings
- Change in director

<sup>\*</sup> Denotes new data element as of 2014-2015



### **2015-16 Quality Assurance Enhancements**

- Perkins PIP Index
- 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



#### 2015-16 Risk Assessment Process

#### 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, Districts, Non-College/Non-District Receiving Carl D. Perkins Grants

**Agency Name: Sunshine State College** 

Target Year: 2013-2014 (Monitoring Year 2015-2016)

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)
Total Budget for all Perkins Grants Combined	Upper Quartile	7			50
	Upper Middle	5		X 10	
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4+	7	7 X 8	X 8	56
	3	5			
	2	3			
	1	1			
*3-year Perkins Improvement Plan (PIP) Index	7.50 – 10.00	7		X 8 0	
	5.00 – 7.49	5	0		0
	2.50 – 4.99	3			
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	0	0			
Agency CTE Program Director	Director Yes 7	_	V 0		
Change from Previous Fiscal Year	No	0	7	X 6	42
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	1 X		4
	Upper Middle	5			
	Lower Middle	3		X 4	
	Lower Quartile	1			
	0	0			
# OAG Audit Findings	Upper Quartile	7	3		12
	Upper Middle	5		X 4	
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
			AGENCY	RISK SCORE:	164



#### **Risk Assessment Process**

 2013-14 grant data was used for risk calculations

 Monitoring will address grants from 2013-14 through 2015-16

 Additional programs in the geographical area may also be reviewed/monitored



#### **IMPORTANT!**

 A high risk assessment score should <u>NEVER</u> be interpreted as a negative reflection on the provider.





#### **Provider Selection 2015-16**

- Agencies with the highest risk matrix may be targeted for monitoring
- Monitor both CTE and AE

Various monitoring strategies are implemented



## **Quality Assurance**

- Fall 2015 targeted providers for on-site monitoring:
  - Tallahassee Community College
  - Orange County School District
  - Florida Literacy Coalition
  - Florida Association for Career and Technical Education (FACTE)
  - Polk County School District
  - State College of Florida



## **Monitoring Process**

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



#### **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



## **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/county 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
  - Teachers/Instructors
  - Students
  - Staff/Faculty
- Observations
- Records Review (2013-14, 2014-15 and 2015-16):
  - Student
  - Finance
  - Personnel
  - o Data



#### **On-site Activities - continued**

- Equipment Inventory
  - According to EDGAR specifications (2013-14 and 2014-15 grants)
  - According to the Uniform Grant Guidance (UGG) (2015-16 grants)
     The final rule implementing the UGG was published in the Federal
     Register on December 19, 2014, and becomes effective for new and continuation awards issued on or after December 26, 2014.
- Perkins Program Improvement
- Plans (if applicable)
- Exit conference



## Have available on the first day...

- Access to records for:
  - o FY 2013-14
  - o FY 2014-15
  - o FY 2015-16
- Policy/handbook for employees
- PLEASE DO <u>NOT</u> 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 class location
- Staff to alert to our visit:
  - Finance Director
  - MIS Director/Institutional Research
  - Other appropriate administrator(s) or principal(s)
- P.S. We pay for our food and drink!



#### **Post-visit Activities**

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



## **Monitoring Report**

#### Areas of Focus:

- Administration
- Data
- Learning Environments
- Student Perspective
- Curriculum and Instruction
- Financial
- Records Review
- Technology and Equipment
- Collaboration



## **Common Findings**

- Lack of Advisory Committee
  - Absence of statements
  - Lack of advisory committee implementation and involvement
  - Lack of business and industry relationships with programs and parental involvement
- Safety and Security findings
   Authority/Law: Life Safety Code 101 (includes schools and colleges),
   Florida Fire Prevention Code, National Fire Protection Association 1 (NFPA1) Chapter 60 and 66
  - Exposed wires and extension cords
  - Safety rules not posted (e.g., auto, welding)
  - Lack of ramp for wheelchair accessibility



## **Common Findings, continued**

- Property inventory findings
   Authority/Law: 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
  - Timesheets were not signed by the employee or the supervisor
  - Executive director approved his/her own travel authorization forms
  - There were several checks that exceeded \$10,000 and were signed only by the executive director



## **Common Findings, continued**

- Data 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 textbooks
- Lack of classroom supplies
- Lack of advisory committee
- Outdated policies and procedures



#### **Common Concerns - continued**

- Lack of attention to off-site location resource needs
- Websites out-of-date
- Physical storage space issues



## **Monitoring Reports**

All monitoring reports are available online:

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



## **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



#### **Tools and Resources**

- Carl D. Perkins Career and Technical Education Improvement Act of 2006 <a href="http://fldoe.org/core/fileparse.php/3/urlt/perkins\_iv\_text.pdf">http://fldoe.org/core/fileparse.php/3/urlt/perkins\_iv\_text.pdf</a>
- Adult Education and Family Literacy Act of 1998 http://www2.ed.gov/policy/adulted/leg/legis.html
- Education Department General Administrative Requirements (EDGAR)
   <a href="http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html">http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html</a>
- Federal Uniform Grant Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards)
   <a href="http://www.ecfr.gov.cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\_main\_02.tpludit-requirements-for-federal-awards">http://www.ecfr.gov.cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\_main\_02.tpludit-requirements-for-federal-awards</a>



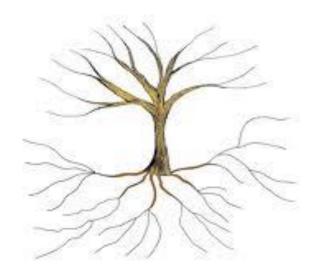
#### **Tools and Resources - continued**

- Quality Assurance Policies, Procedures, and Protocols http://fldoe.org/academics/career-adult-edu/compliance
- Florida Department of Education, Career and Adult, Compliance <a href="http://www.fldoe.org/academics/career-adult-edu/compliance">http://www.fldoe.org/academics/career-adult-edu/compliance</a>
- Florida Department of Education "Green Book"
   <u>http://www.fldoe.org/finance/contracts-grants-procurement/grants-management</u>
   (Pending Final Approval)
- Workforce Innovation and Opportunity Act of 2014 <a href="http://www.doleta.gov/WIOA/">http://www.doleta.gov/WIOA/</a>



## [Q&A]

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





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