

Quality Assurance and Compliance Desk Monitoring Review for Adult Education

Florida Literacy Coalition

February 24-28, 2020

Final Report

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Florida Department of Education Division of Career and Adult Education

Florida Literacy Coalition Adult Education Quality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Florida Department of Education (FDOE), Division of Career and Adult Education (division), in carrying out its roles of leadership, resource allocation, technical assistance, monitoring and evaluation, is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The Quality Assurance and Compliance (QAC) section is responsible for the design, development, implementation and evaluation of a comprehensive system of quality assurance including monitoring. The role of the quality assurance system is to assure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is incumbent upon the division to monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

The FDOE receives federal funding from the U.S. Department of Education (USDOE) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Strengthening Career and Technical Education for the 21st Century Act, and for Adult Education (AE) under the Workforce Innovation and Opportunity Act (WIOA) of 2014. FDOE awards sub-grants to eligible providers to administer local programs. FDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for CTE and Adult Education/Family Literacy. Each state shall have procedures for reviewing and approving applications for sub-grants and amendments to those applications, for providing technical assistance, for evaluating projects and for performing other administrative responsibilities the state has determined are necessary to ensure compliance with applicable statutes and regulations pursuant to 34 CFR 76.770, Education Department General Administrative Regulations (EDGAR) and the Uniform Grant Guidance (UGG) for grant awards issued on or after December 26, 2014. The Florida Department of Education, Division of Career and Adult Education, is required to oversee the performance of sub-grantees in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes).

Additional citations noting pertinent laws and regulations and authority to monitor are located in the 2019-2020 Quality Assurance Policies, Procedures and Protocols, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES AND PROTOCOLS

The Quality Assurance Policies, Procedures and Protocols manual was revised in the 2019-20 program year. The manual is provided to each provider prior to the monitoring visit. The manual provides a summary of each facet of the monitoring design and the process. It also contains protocols that may be used as agencies are monitored or reviewed. References may be made to the manual in this document; it is located on the division's website at http://fldoe.org/academics/career-adult-edu/compliance.

IV. PROVIDER SELECTION

Various sources of data are used throughout the implementation of the quality assurance system. The monitoring component of the system is risk-based. Risk assessment is a process used to evaluate variables associated with the grants and assign a rating for the level of risk to the department and the division. A risk matrix, identifying certain operational risk factors is completed for each provider. The risk matrix for

each program monitored is located in Appendix A. The results of the risk assessment process and consideration of available resources are used to determine one or more appropriate monitoring strategy(ies) to be implemented.

The QAC section 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 monitoring strategy for Florida Literacy Coalition (FLC) was determined to be a desk monitoring review. Notification was sent to Ms. Jan Setzekorn, president, Florida Literacy Coalition on December 19, 2019. The designated representative for the agency was Mr. Gregory Smith.

The desk monitoring review was set to take place February 24-28, 2020, by a representative of the Quality Assurance and Compliance section of the division: Mr. Michael Swift, program specialist.

V. FLORIDA LITERACY COALITION

The provider was awarded the following grants for FY's 2017-18, 2018-19 and 2019-20:

Finance			
FY 2017-18			
<u>Grant</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Adult Education - Leadership	764-1928B-8PL01	\$ 215,000.00	\$ 10,279.25
FY 2018-19			
Grant	Grant Number	Grant Amount	Unexpended
Adult Education - Leadership	764-1929B-9PL01	\$ 220,000.00	\$ 19,763.17
FY 2019-20			
Grant	Grant Number	Grant Amount	Unexpended*
Adult Education - Leadership	764-1920B-0PL01	\$ 220,000.00	\$ N/A

^{*} FY 2019-20 final project disbursement reports will not be available until the end of the program year.

Additional information about the provider may be found at the following web address: www.floridaliteracy.org

VI. MONITORING ACTIVITIES

The desk monitoring review activities included administrative, financial, review of deliverables and an exit conference call.

Records Review

Program, financial and administrative records were reviewed. A complete list is provided in section VII, item C. Policies and procedures were also reviewed.

VII. RESULTS

- **A.** <u>ADMINISTRATION:</u> refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
 - The day to day operations of FLC is run by a board approved executive director.

- Administrative staff such as a training coordinator, research specialist, etc. are supported by federal leadership funds.
- The executive director is responsible for managing the FDOE grant, submitting completed quarterly deliverables to FDOE, as well as other duties detailed in the executive director's job description.
- FLC retains records for a minimum of seven years, and financial records are held indefinitely within their financial management system.
- FLC is referred to in the unified state plan as one of Florida's professional development providers in adult education. FLC provides resources to support objectives related to integrated English literacy and civics, basic literacy skills development and supporting AE practitioners.
- **B.** <u>ACCESS AND EQUITY:</u> refers to compliance with the requirements of federal non-discrimination laws as relating to recruitment, enrollment, participation and completion of programs.
 - The Office of Equal Educational Opportunity (OEEO) is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEO at 850-245-0511.
- C. <u>RECORDS REVIEW:</u> refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.
 - FLC operational and financial policies and procedures
 - 2017-18 and 2018-19 quarterly deliverables submitted to FDOE
 - Training schedules, records and resources
 - Calendar of statewide training events
 - Inventory listing
 - List of contract service agreements
 - The completed Desk Monitoring Review packet and Leadership protocol
- **D. <u>FINANCIAL:</u>** 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.
 - Grant expenditures are primarily tracked and monitored by the Executive Director. Additional administrative staff also help to ensure that grant funds are spent efficiently and in accordance to their FDOE approved grant.
 - FLC uses QuickBooks as their in house financial management and accounting system.
 - FLC has policies and procedures on procurement practices to ensure economical spending.
 The Executive Director has authority to approve expenditures, and reports directly to the Board of Directors.
 - Inventory equipment records are kept in accordance to federal and state law.
 - FLC submits accurate and timely quarterly deliverables to FDOE for payment.
 - FLC has multiple contract service agreements to assist in the execution of program deliverables.

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Required Action Plan – FLC is not required to complete an AE Corrective Action Plan.

IX. SUMMARY

Once the deskwork is completed, including receipt of additional requested information when applicable, a preliminary report is forwarded to the provider for review. Comments are accepted and will be considered at the discretion of the FDOE monitoring team lead. Once the final report is approved, it will be forwarded to the agency head along with a copy to the provider's designated contact person. The final report will be posted on the department's website at the following address: http://fldoe.org/academics/career-adult-edu/compliance.

Finally, the division issues a closure letter to the agency head and designated contact person. This letter indicates that all outstanding resolution items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

On behalf of the department, the monitoring team extends its appreciation to all participants in the FLC onsite monitoring visit. Special thanks is offered to Mr. Gregory Smith for his participation in this desk monitoring review process.

APPENDIX A

Florida Literacy Coalition Adult Education Risk Matrix

Risk Scores Matrix for a Non-College or Non-School District Receiving Adult Education (AE) Grants

Agency Name: FLORIDA LITERACY COALITION

Program Type: **AE**Target Year: **2017-2018**Monitoring Year: **2019-2020**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points	
	7 or More Years	7	3	<u>X 10</u>		
Number of Years Since Last	5-6	5			30	
Monitored	3-4	3				
	0-2	1				
	Upper Quartile	7		<u>X 8</u>	24	
Total Budget for all Adult	Upper Middle	5	3			
Education Grants Combined	Lower Middle	3				
	Lower Quartile	1				
	4 or More	7			8	
November of Adult Education	3	5				
Number of Adult Education	2	3	1	<u>X 8</u>		
Grants	1	1				
	No	0				
Agency AE Program	Yes	7	0	<u>X 6</u>	0	
Director Change from	No	0				
Previous Fiscal Year						
Unexpended Funds from all	Upper Quartile	<u>7</u> 5	3	<u>X 4</u>	12	
	Upper Middle Lower Middle					
Adult Education Grants		3				
Combined	Lower Quartile	0				
	0 Target Not Met	U		<u>X 6</u>	0	
	Target Not Met on 3 of 3	5				
	Indicators	3	0			
	Target Not Met					
Adult Education Decomo	on 2 of 3	3				
Adult Education Program Improvement Plan (AEPIP)	Indicators	3				
Improvement Fian (AEFIF)	Target Not Met		1			
	on 1 of 3	1	_			
	Indicators	1				
	All Targets Met	0				
AGENCY RISK SCORE:						

Data sources used for calculations: Prior to July 1, 2018