



Fall 2019 Provider Training

Quality Assurance and Compliance Monitoring



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Fall 2019 Provider Training Webinar

August 22, 2019

10:00 AM – 12:00 PM (EST)

Webinar registration link:

<https://attendee.gotowebinar.com/register/132500347771978499>

Call number: 1-888-585-9008

Participant Access Code: **789017479** then press #

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- If your phone does not have a mute button, press *6
- Press *5 to enter conference mode, unlock call at end of presentation.

FACILITATOR

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Objectives of Webinar

To provide participants with information regarding grant program monitoring scheduled for Fiscal Year 2019-20



Fiscal Years and Programs Monitored

- Fiscal Years (FY) monitored:
 - 2017-18, 2018-19 and 2019-20
- Grant Programs to be monitored:
 - Adult Education (AE)
 - Carl D. Perkins (CTE)

Webinar Topics

- Regulatory requirements
- Why do we monitor?
- What is our way of work?
- Risk Assessment
- How do we select agencies to monitor?
- Agencies selected for Fall 2019 monitoring
- Monitoring process
- Program areas of focus (new for 2019-20)
 - **CTE** –Size Scope and Quality (SSQ) and Data Quality Standards
 - **AE** – Integrated Education Training (IET), Data Quality Standards and SSQ

Webinar Topics - cont'd

- Pre-visit, on-site, and post-visit
- Items to have available for review
- Post-visit monitoring report
- Examples of monitoring findings
- General Q & A



Regulatory Requirements

- Federal and state requirement
 - 2 C.F.R. Part 200, Uniform Grant Guidance (link below)
<http://www.ecfr.gov/cgi-bin/text-idx?SID=704835d27377ef5213a51c149de40cab&node=2:1.1.2.2.1&rgn=div5>
- 2 C.F.R. Part 200.61 and 200.62 (Internal Controls)
- Workforce Innovation and Opportunity Act of 2014
- Carl D. Perkins - The Strengthening Career and Technical Education for the 21st Century Act (Perkins V)



Internal Control Policies and Procedures

- Conflict of Interest
- Fraud
- Travel
- Inventory/equipment
- Procurement
- Allowability
- Gratuity
- Cash Management
- Retention of Records

*All items listed **MUST** be in writing

Why Do We Monitor?

- Opportunity for needed corrections
- Continuous improvement and positive changes
- Recognition

What is Our Way of Work?

Implementation of a risk-based system that is:

- Based on project and provider risk;
- 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 2019-20

Risk Matrix – Operational Risk Factors (Metrics)

- Adult Education Program Improvement Plan (AE only)
- Perkins Program Improvement Plan (CTE only) *
- Change in Management Information System (MIS)
- Last monitoring review
- Number of grants
- Total budget of all Perkins V or WIOA grants combined
- Number of grant funds remaining
- Audit/monitoring findings
- Change in director

* Suspended during the Perkins V transition year

2019-20 Risk Assessment Process

- 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

2019-20 Risk Assessment Process – Cont'd

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 and School Districts

Carl D. Perkins Grants

Agency Name: Sunshine State College

Target Year: 2017-2018 (Monitoring Year 2019-2020)

* CTE Program Improvement Plans will be suspended during the 2019-20 transition year

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)
Number of Years Since the Agency Was Last Monitored	7 or more years	7	5	X 10	50
	5-6 Years	5			
	3-4 Years	3			
	0-2 Years	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	5	X 8	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4+	7	7	X 8	56
	3	5			
	2	3			
	1	1			
Change in Management Information System (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	X 6	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	1	X 4	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
# OAG Audit Findings	Upper Quartile	7	3	X 4	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					204

(Sample) Risk Matrix for Colleges and School Districts

Adult Education Grants

Agency Name: Sunshine State College

Target Year: 2017-2018 (Monitoring Year 2019-2020)

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)
Number of Years Since the Agency Was Last Monitored	7 or more years	7	5	X 10	50
	5-6 Years	5			
	3-4 Years	3			
	0-2 Years	1			
Total Budget for all Adult Education Grants Combined	Upper Quartile	7	5	X 8	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Adult Education Grants	4+	7	7	X 8	56
	3	5			
	2	3			
	1	1			
Change in Management Information System (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency Adult Education Program Director Change from Previous Fiscal Year	Yes	7	7	X 6	42
	No	0			
Adult Education Performance Improvement Plan (AEPiP) * *New metric for 2019-20	Upper Quartile	7	5	X 4	20
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Unexpended Funds from all Adult Education Grants Combined	Upper Quartile	7	1	X 4	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
# OAG Audit Findings	Upper Quartile	7	3	X 4	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					224



Risk Assessment Process – Cont'd

- 2017-18 grant data was used for risk calculations
- Risk scores are ranked highest to lowest
- Monitoring will address grants from 2017-18 through 2019-20

Provider Selection 2019-20

- Providers with the highest risk score **may** be targeted for monitoring
- Monitor both CTE and AE
- Various monitoring strategies are implemented
 - Desk monitoring vs onsite monitoring
 - Targeted monitoring (media, whistleblower, follow-up)
 - Additional providers in the geographical area may also be reviewed/monitored

Quality Assurance

Fall 2019 providers for on-site monitoring:

- Polk County School District
- Indian River State College
- Learn to Read - Duval
- Nassau County School District
- Hernando County School District
- South Florida State College
- Lake Wales Charter School
- Miami-Dade County School District

Monitoring Process

- Pre-visit, on-site and post-visit activities
- Records and data reviews (all phases)
- Interviews
 - Phone calls, emails
 - Referrals
- Resolution Action Plans as a result of a finding

Pre-visit Activities

- Notification (personal and correspondence)
- Webinar training for providers
- 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 for inventory (onsite)
 - Staff to alert to our visit

Information Required

- Organizational chart
- List of administrative staff with duties relevant to these grants; including location and contact numbers
- Inventory listings of all equipment purchased with Perkins or Adult Education grant funds for the years being monitored.
- 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 records

On-site Activities

- Entrance Conference – 1 hour maximum
 - Provider presentations (optional)
 - Overview of the monitoring process
- Interviews
 - Administrators
 - Staff/Faculty if needed
- Records Review (2017-18, 2018-19 and 2019-20)
 - Student level – Literacy Completion Points, Occupational Completion Points, Industry Certifications, etc.
 - Finance – Travel, Procurement/Purchasing, etc.
 - Personnel – Employee time and effort verifications
 - Data Quality Standards
 - Size, Scope and Quality requirements for AE and CTE

On-site Activities – cont'd

- Equipment Inventory
 - According to EDGAR specifications – (2017-18 through 2019-20 grants)
 - According to the Uniform Grant Guidance (UGG) –
The final rule implementing the UGG was published in the Federal Register on December 19, 2014, and became effective for new and continuation awards issued on or after December 26, 2014.
- Exit conference

First Day (on-site)...

- Access to records for:
 - FY 2017-18
 - FY 2018-19
 - FY 2019-20
- Policy/handbook for employees
- **PLEASE DO NOT MAKE COPIES!**
- Handbooks and materials for students (include student enrollment packet)
- Attendance policies
- Recruitment efforts
- General policies and procedures

First Day (on-site) - cont'd

- Governing board and advisory committee(s) related documents (may be a procedures manual)
- 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 location

Inventory Guidelines

The following elements are required on the inventory of all equipment purchased.

2 C.F.R. 200, Uniform Grant Guidance, 200.313

Equipment: Property records must be maintained that include:

- Description of Property
- Serial Number/ID Number
- The source of the funding
- Title Holder
- Acquisition Date
- Cost of Property
- Percentage of Federal Participation
- Location of Property
- Use and Condition of Property
- Sale Price
- Date of Disposal

Sample Property Inventory List

SUNSHINE STATE COLLEGE

Property Inventory List

Serial Number/ ID Number	Description of Property	Source of Funding	Title Holder	Acquisition Date	Cost of Property	Sale Price	Manufacturer	Location of Property/ Room	Date of Disposal
F415661D9HD4	COMPUTER IMAC 27"	ADULT BASIC	JOHN STEWART	05/30/15	\$4,534.21	N/A	APPLE	456	N/A
F45892S3589	6 BURNER GAS RANGE	CARL PERKINS	PAMELA BROWN	08/05/14	\$5,423.54	\$4,562.01	US RANGE GARLAND	125	2/15/2016
S6D3356V23	WARMING CABINET	CARL PERKINS	MARIE OLIVER	05/18/15	\$245.21	N/A	VULCAN	124	N/A
FG541S226	STORAGE CABINET	ADULT BASIC	STEPHEN GRAY	06/24/15	\$4,587.23	\$1,542.25	GMI	163	N/A
F5G65623SD	DRONE HELICOPTER	ADULT BASIC	LYLE GOLDEN	06/08/16	\$451.24	N/A	DJI	214	N/A
465.54L56	COMPUTER IMAC 27"	CARL PERKINS	JAMES HARRIS	08/07/13	\$5,685.51	N/A	APPLE	321	5/30/2015
298556	TABLE W/ WHEELS	CARL PERKINS	MICHAEL JONES	10/15/13	\$4,876.55	\$3,453.25	EAGLE GROUP	325	12/7/2015
5545600	WORKING TABLE	ADULT BASIC	ELIZABETH REYS	12/07/15	\$8,756.25	N/A	EAGLE GROUP	323	N/A
NONE	PRINTER	ADULT BASIC	JASON BORNE	03/10/15	\$5,543.14	N/A	HP	154	N/A
UHKJ554521	MOBILE LAB CHART	CARL PERKINS	VALERIE HODGE	09/21/15	\$5,463.24	N/A	SPECTRUM	245	6/22/2016
NONE	COMPUTER IMAC 27"	ADULT BASIC	MELINDA JONES	11/24/15	\$5,513.15	N/A	APPLE	186	N/A
87456.45.456	DEEP FRYER	CARL PERKINS	HAROLD WHITE	09/24/13	\$2,685.00	\$745.25	PITCO	152	4/24/2016



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Post-visit Activities

Post-visit Activities

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

Monitoring Report

Components:

- Administration
- Data
- Curriculum and Instruction
- Financial
- Records Review
- Technology and Equipment
- Collaboration

Examples of monitoring findings

- Failure to accurately report student data to FDOE: UGG 2 CFR 200.328 Monitoring and reporting program performance, F.S. 1008.43 Career program reporting requirements
- Testing administrators (TABE and CASAS) not adhering to certification/recertification requirements set forth by law and FDOE:WIOA Section 231(e)(9) Qualified instructors and staff, 2016-2017 Florida Adult Education Assessment Technical Assistance Paper, F.A.C. 6A-10.042 Maintenance of test security, F.S. 1008.24 Test administration and security

Examples of monitoring findings - cont'd

- Property control and inventory findings:
Authority/Law: 2 C.F.R. 200, Uniform Grant Guidance, 200.313 Equipment and EDGAR, Section 80.32 Equipment, (d) (1)
- Procurement findings:
Authority/Law: 34 CFR 80.36(b) – Procurement Standards
 - Lack of policies and procedures for contracting and/or purchasing goods and services
 - Unauthorized purchases made against the federal grant
 - Spending federal grant dollars prior to approval of requested grant amendments
 - Spending federal grant dollars **WITHOUT** approval of requested grant amendments

General 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 policies and procedures
- Lack of attention to off-site location resource needs
- Incomplete MOU and contract service agreements

Best Practices

- Innovative uses of technology
- Continued collaboration with business and industry
- Integration of academics with career themed curriculum
- Effective use of advisory boards
- Effective communication between administrative, program and support staff

Previous Monitoring Reports

- Monitoring reports are available online:

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

Tools and Resources

- Workforce Innovation and Opportunity Act of 2014
<https://www.doleta.gov/WIOA/>
- The Strengthening Career and Technical Education for the 21st Century Act (Perkins V)
<http://www.fldoe.org/academics/career-adult-edu/funding-opportunities/PerkinsV.shtml>
- Education Department General Administrative Requirements (EDGAR)
<https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

Tools and Resources – cont'd

- Federal Uniform Grant Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards)
<https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>
- Florida Department of Education, Quality Assurance and Compliance
<http://fldoe.org/academics/career-adult-edu/compliance>

Tools and Resources – cont’d

- Florida Department of Education “Green Book”
<http://www.fldoe.org/finance/contracts-grants-procurement/grants-management>

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[Q & A]

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



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