

Fall 2020 Provider Training Quality Assurance and Compliance

Virtual Desk Monitoring Review



Fall 2020 Provider Training Webinar

August 20, 2020

2:00 PM - 4:00 PM (EST)

Webinar registration link:

https://attendee.gotowebinar.com/register/6025531936140493072

Call number: 1-877-309-2074

Participant Access Code: 441-707-965 then press #



Minimize Background Noise

- 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
- Press *5 to enter conference mode, unlock call at end of presentation.

FACILITATOR

Kara Kearce, Director

Quality Assurance and Compliance Bureau of Grants Administration and Compliance Division of Career and Adult Education

850-245-9033

Kara.Kearce@fldoe.org



Purpose of the Webinar

- To provide participants with information regarding Quality Assurance and Compliance in the following areas:
 - Vision
 - Risk Assessment
 - Monitoring Strategies
 - Targeted Providers, 2020-21
 - Areas of Focus
- Describe the pre-monitoring, desk review, and postmonitoring activities.
- Share examples of findings and concerns
- Answer general questions.



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,
- Continuous program improvement.



Webinar Topics

- Fiscal Years and Programs Monitored
- Regulatory requirements
- Risk Assessment
- Agencies selected for Fall 2020 monitoring
- Monitoring process

- Monitoring report's
- Examples of monitoring findings
- Tools and Resources
- General Q & A



Fiscal Years and Programs Monitored

Fiscal Years (FY) monitored:

2018-19, 2019-20 and 2020-21

Grant Programs to be monitored:

Adult Education (AE)

Carl D. Perkins (CTE)





Regulatory Requirements



Regulatory Requirements

Federal and state requirement

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o 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 (WIOA)
- Carl D. Perkins The Strengthening Career and Technical Education for the 21st Century Act (Perkins V)



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



Risk Assessment Factors 2020-21

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
- Amount of grants
- Total budget of all Perkins V or WIOA grants combined
- Number of grant funds remaining
- Audit/monitoring findings
- Change in director



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



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

IMPORTANT! A high risk assessment score should NEVER be interpreted as a negative reflection on the provider.



(Sample) Risk Matrix for Colleges and School Districts

Carl D. Perkins Grants

Agency Name: Sunshine State College

Target Year: 2018-2019 (Monitoring Year 2020-2021)

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)
Number of Years Since	7 or more years	7			
	5-6 Years	5	5	X 10	50
the Agency Was Last	3-4 Years	3	5		30
Monitored	0-2 Years	1			
	Upper Quartile	7			40
Total Budget for all	Upper Middle	5	5	X 8	
Perkins Grants Combined	Lower Middle	3	5	Λ 0	
	Lower Quartile	1			
	4+	7			
Number of Perkins Grants	3	5	7	V .0	56
Number of Perkins Grants	2	3	/	X 8	
	1	1			
	Yes	7			
Change in Management Information System (MIS) from Previous Fiscal Year	No	0	0	X 6	0
Agency CTE Program	Yes	7	7	X 6	42
Director Change from Previous Fiscal Year	No	0	,	A 0	12
	Upper Quartile	7			4
Unexpended Funds from	Upper Middle	5			
all Perkins Grants	Lower Middle	3	1	X 4	
Combined	Lower Quartile	1			
	0	0			
	Upper Quartile	7			
	Upper Middle	5	3	X 4	12
# OAG Audit Findings	Lower Middle	3			
	Lower Quartile 1				
	0	0			
			AG	ENCY RISK SCORE:	204

(Sample) Risk Matrix for Colleges and School Districts

Adult Education Grants

Agency Name: Sunshine State College

Target Year: 2018-2019 (Monitoring Year 2020-2021)

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

Risk Assessment Process - Cont'd

- 2018-19 grant data was used for risk calculations
- Risk scores are ranked highest to lowest

Monitoring will address grants from 2018-19

through 2020-21







Provider Selection 2020-21

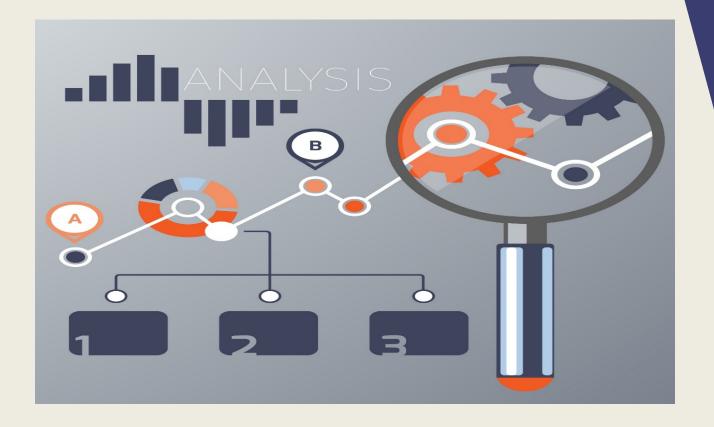


Fall Provider Selection 2020-21

- Brevard County SD
- DeSoto County SD
- Dixie County SD
- Eastern FL State College
- FL School Deaf & Blind
- Franklin County SD
- Glades County SD
- Jefferson County SD

- Northwest FL State College
- Okaloosa County SD
- Palm Beach SD
- Palm Beach State College
- Santa Rosa SD
- St John SD
- Tallahassee Community College
- Taylor County SD

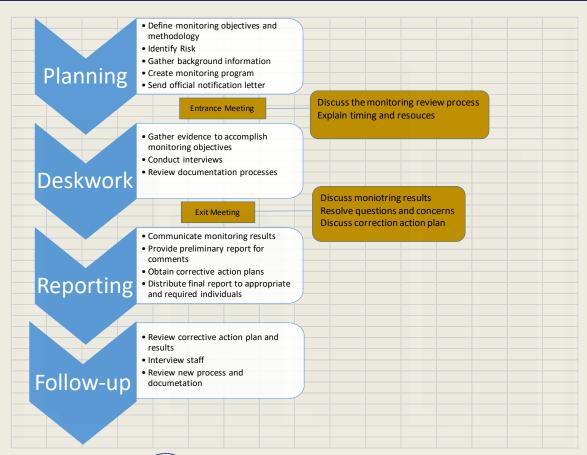




MONITORING PROCESS



Flow Chart





Monitoring Strategies

- Phone calls
- RFA / RFP reviews
- Records reviews
- Self-Assessment
- Technical assistance
- Program improvement plans

- Referral for fiscal review
- Referral for data review
- Verification activities
- Investigations
- On-site visit
- Desk review
- Corrective action plans



Pre-Monitoring Activities

- Notification (personal and correspondence)
 - Personal contact with Director of program
 - Letter from Chancellor to Agency Head
 - Memorandum from Director of Quality Assurance and Compliance
- Conference calls
 - Training for providers (August and December)
 - Individual calls with providers
- Pre-visit meeting with FDOE staff



Pre-Monitoring Activities

- Designation of agency contact (one person per agency)
- Coordination and communication with agency contact and Lead Reviewer
- Finalize the schedule
- ShareFile created



Virtual Desk Monitoring Activities

- Entrance Conference 1 hour maximum
 - Provider presentations (optional)
 - Overview of the monitoring process
- Virtual Interviews
 - Administrators
 - Staff/Faculty if needed
- Records Review (2018-19, 2019-20 and 2020-21)
 - Student level Literacy Completion Points, Occupational Completion Points, Industry Certifications, etc.
 - Finance Travel, Procurement/Purchasing, etc.
 - Personnel Employee time and effort verifications



Virtual Desk Monitoring Activities

- Records Review (2018-19, 2019-20 and 2020-21)
 - Data Quality Standards
 - Size, Scope and Quality requirements for CTE
- Equipment Inventory
 - Complete Inventory of equipment purchased with grant funds, by site.
 - Reviewer will select a sample for further review
 - Pictures will be uploaded to the ShareFile
 - Exit Interviews



Post-Monitoring Activities

- Post visit meeting with FDOE staff
- Thank you letters
- Evaluation Survey
- Monitoring Report
 - Preliminary Draft sent to Director for feedback
 - Final Report- sent to Agency Head
- Resolution activities
 - Corrective Action / Action Plans
 - Follow-up communication
- Closure



Example Monitoring Schedule

Date	Activity
Monday, August 31, 2020	
9:00 a.m. – 10:00 a.m.	Virtual Entrance Meeting
10:00 a.m. – 5:00 p.m.	Core Activity 1: Career and Technical Education Objective 1.a: Accountability Objective 1.b: Local Application Objective 1.c: Local Use of Funds
Tuesday, September 1, 2020	
8:00 a.m. – 5:00 p.m.	Core Activity 2: Adult Education Objective 2.a: Performance Accountability System Objective 2.b: Local Application Objective 2.c: Leadership Activities
Wednesday, September 2, 2020	
8:00 a.m. – 5:00 p.m.	Core Activity 3: Financial Management Objective 3.a: Statutory and National Policy Requirements Objective 3.b: Contracts and Procurement
Thursday, September 3, 2020	Core Activity 3: Financial Management
8:00 a.m. – 5:00 p.m.	Objective 3.c: Equipment: Objective 3.d: Allowable Cost: Objective 3.e: COVID-19 Response
Friday, September 4, 2020	
8:00 a.m. – 2:30 p.m.	Questions, Provide Possible Technical Assistance and Wrap Up
2:30 a.m. – 3:30 p.m.	Virtual Exit Meeting



FDOE ShareFile

Purpose

- Citrix ShareFile® is the Florida Department of Education's (FDOE) cloud-based secure file transfer solution. This solution is used to transfer files that are confidential, as well as too large and/or too numerous to send in a single email.
- Maintain compliance with The Family Education Rights and Privacy Act (FERPA).



New Accounts

 You will receive an email to create your Citrix ShareFile® account. Click on the

activation link:

to me 🐨	Support <mail@sf-notifications.com></mail@sf-notifications.com>	11:29 AM (1 hour ago) 🔅	
	FLORIDA DEPARTMENT OF EDUCATION Moleculary		
	Security,		
	Welcomel You have been added to the account for S	tate of Florida - Dept of Education.	
	A note from Ahsan :		
	I've added you to my ShareFile account!		
	cavating your account will allow you to create your amust be used within this text 30 days.	password. This link is unique to you and	
	Activate Account		
	Trouble with the above line? You can copy and paste of /ffldoe_shareflemi/?a=330945f6ee9984d1&ull	the following URL into your web browser: n=bp	
	ShareFile is a tool for sending, receiving, and organizing your password-protected area for sharing information with clients ar are too large to e-mail.	business files online. It can be used as a nd partners, and it's an easy way to send files that	
	Powered By Citrix ShareFile 2017		



Password

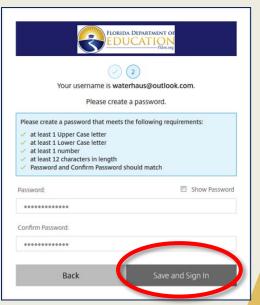
You will be prompted to change and confirm a new password.

Password requirements:

- Upper and lower case letters
- At least one number
- At least 12 characters in length
- Password and confirm password should match

For security reasons, your password:

- •Is not stored
- •Is not retrievable
- Expires after 180 days
- •Cannot be the same as your last two passwords
- After five failed login attempts, you are locked out.
- Try again in five minutes or call the Help Desk at 850-245-9444.
- •Click Save and Sign In.





Dashboard

- The dashboard is the first page you see when signing into your account. Menu items and buttons displayed depend on your account permissions and abilities as set by the Administrator.
- Access folders, people and settings are located on the left side of the dashboard.

Hello William Add profile picture

Once you sign into the site, you should see the welcome page.



Upload

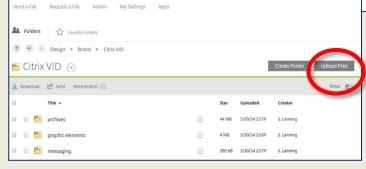
Upload Files to Folders

Navigate to the folder to upload a file. You can only upload a file that you have permission to upload in the

folder under Shared Folders. States Folders.

 Click Upload Files button, located in the upper right corner of the

page.



 On the next screen, drag and drop the files you wish to upload from your computer folder or desktop to the box on the screen.

Dashboard

Recent Files and Folders

These are the items you recently accessed. This private list is only visible to you.

ShareFile Download or Upload File V1.docx

In Development > How-To Documents

ShareFile - Add Client User to Folder.docx

ShareFile SharingFile v2.docx

> How-To Documents

New ShareFile Account. v1.docx

Policy - Computer Security Incident Response...

Name Here Add profile picture



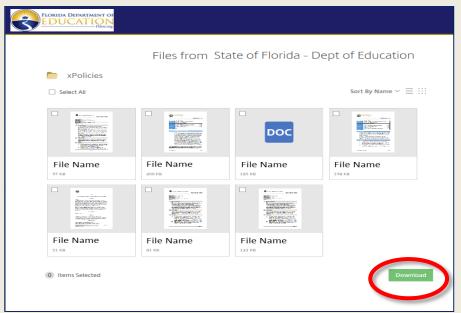
Download

Download Files from a Folder

Navigate to the folder in your Citrix ShareFile® account that contains the file to download.

In the drop-down menu select the files, click

Download.



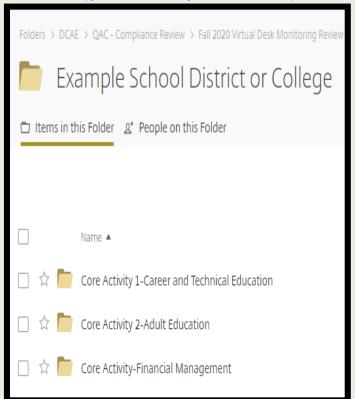


What to Expect in the ShareFile

Each folder will be set up by

Core Activity

(grants being monitored)



The Core Activity folder will have sub folder for the Objectives (protocols)

CAE > QAC - Compliance Review > Fall 2020 Virtual Desk Monitoring Review > Example School
Core Activity 1-Career and Technical Educa
ms in this Folder <u>Q*</u> People on this Folder
Name ▲
Objective 1.a Accountability
Objective 1.b Local Application
Objective 1.c Local Use of Funds



Objective's

Provider Review Protocol Core		bjective 1.a - A	mical Education ability Methods of Collection/ of Documentary Evidence	Notes
Does the provider use approved student assessment systems upon a student's enrollment into a C.T.E. program?	С	Perkins Sec. 113 F.S. 1004.91(2) F.A.C. 6A-6.014	Interview Document review: Student records (selection to be provided by FDOE) Test proctor certifications	
Does the provider require basic skills requirements for entry into a C.T.E. program?	С	Perkins Sec. 113 F.A.C. 6A-6.014	Interview Document Review: Course catalog for C.T.E. programs	
Does the provider have written procedures for the collection, verification, analysis and reporting of student data?	С	UGG 200.328(b)(2)	Interview Document Review: Policies and procedures on data collection and reporting	



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



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

Perkins-Funded Equipment Inventory 2 CFR 200.313

Acquisition Date	Description of Item	Serial Number	Model Number	Other Identificati on Number	Unit Cost	Funding Source(s) including the FAIN	Who holds the title?	% of Cost by Source	Location of Item	Use and Cond ition	Date of Inventory	Dispositi on Data	COVID 19 Donated or Loaned
9/28/18	Camcorder	1140512	HDC-CX250	TAG # 1	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
9/28/18	Camcorder	1140513	HDC-CX250	Tag #2	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
9/28/18	Camcorder	1140514	HDC-CX250	Tag # 3	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
4/15/19	3-D Printer	1142425	HDC-CX250	Tag #4	\$1,230.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135750	HDC-CX250	Tag #5	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135751	HDC-CX250	Tag #6	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135752	HDC-CX250	Tag# 7	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
3/21/19	Elec. Countertop Fryer	1142120	HDC-CX250	Tag# 8	\$1,593.59	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New			



Monitoring Report

Components:

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

Previous monitoring reports are available to review online:

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







 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.



• 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

FLORIDA DEPARTMENT

Best Practice

- 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



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.stml
- Education Department General Administrative Requirements (EDGAR)
 https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html



Tools and Resources

- 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



[Q&A]

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





Quality Assurance and Compliance Team

Kara Kearce	850-	245-9033

Michael Swift 850- 245-9051

<u>Charles Davis</u> 850- 245-9022

Henry Mack, Chancellor Division of Career and Adult Education

Gloria Spradley-Brown, Chief Bureau of Grants Administration and Compliance

