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.
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 post-monitoring activities.
- Share examples of findings and concerns
- Answer general questions.
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
  - 2 C.F.R. Part 200, Uniform Grant Guidance (link below)
    [link](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

<table>
<thead>
<tr>
<th>Category</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Upper Quartile/Higher</td>
<td>7</td>
</tr>
<tr>
<td>Upper Middle</td>
<td>5</td>
</tr>
<tr>
<td>Lower Middle</td>
<td>3</td>
</tr>
<tr>
<td>Lower Quartile</td>
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</tr>
<tr>
<td>Zero</td>
<td>0</td>
</tr>
</tbody>
</table>
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)

<table>
<thead>
<tr>
<th>Metric</th>
<th>Scaling</th>
<th>Point Value</th>
<th>Point Value Assigned (PVA)</th>
<th>Weight</th>
<th>Total Metric Points (PVA X Weight)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Number of Years Since the Agency Was Last Monitored</strong></td>
<td>7 or more years</td>
<td>7</td>
<td>5</td>
<td>X 10</td>
<td>50</td>
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<tr>
<td></td>
<td>5-6 Years</td>
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<td>X 10</td>
<td>50</td>
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<td>3-4 Years</td>
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<td>X 10</td>
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<tr>
<td></td>
<td>0-2 Years</td>
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<td>X 10</td>
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<tr>
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<td>Lower Quartile</td>
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<td>X 8</td>
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<tr>
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<td>4+</td>
<td>7</td>
<td>7</td>
<td>X 8</td>
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<tr>
<td></td>
<td>3</td>
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<td>7</td>
<td>X 8</td>
<td>56</td>
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<tr>
<td><strong>Change in Management Information System (MIS) from Previous Fiscal Year</strong></td>
<td>Yes</td>
<td>7</td>
<td>7</td>
<td>X 6</td>
<td>42</td>
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<td>No</td>
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<td>X 6</td>
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<tr>
<td><strong>Agency CTE Program Director Change from Previous Fiscal Year</strong></td>
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<td>7</td>
<td>7</td>
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<tr>
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<td>X 6</td>
<td>0</td>
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<tr>
<td><strong>Unexpended Funds from all Perkins Grants Combined</strong></td>
<td>Upper Quartile</td>
<td>7</td>
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<td>X 4</td>
<td>4</td>
</tr>
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<td>Lower Quartile</td>
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<td>1</td>
<td>X 4</td>
<td>4</td>
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<tr>
<td><strong># OAG Audit Findings</strong></td>
<td>Upper Quartile</td>
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<td>3</td>
<td>X 4</td>
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<td></td>
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<td>3</td>
<td>X 4</td>
<td>12</td>
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<td>Lower Middle</td>
<td>3</td>
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<td>X 4</td>
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<tr>
<td></td>
<td>Lower Quartile</td>
<td>1</td>
<td>3</td>
<td>X 4</td>
<td>12</td>
</tr>
</tbody>
</table>

**AGENCY 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)

<table>
<thead>
<tr>
<th>Metric</th>
<th>Scaling</th>
<th>Point Value</th>
<th>Point Value Assigned (PVA)</th>
<th>Weight</th>
<th>Total Metric Points (PVA X Weight)</th>
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</tr>
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<td></td>
<td>0-2 Years</td>
<td>1</td>
<td>1</td>
<td>X 10</td>
<td>10</td>
</tr>
<tr>
<td>Total Budget for all Adult Education Grants Combined</td>
<td>Upper Quartile</td>
<td>7</td>
<td>5</td>
<td>X 8</td>
<td>40</td>
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<tr>
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<td></td>
<td>Lower Quartile</td>
<td>1</td>
<td>1</td>
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<td>8</td>
</tr>
<tr>
<td>Number of Adult Education Grants</td>
<td>4+</td>
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<tr>
<td>Change in Management Information System (MIS) from Previous Fiscal Year</td>
<td>Yes</td>
<td>7</td>
<td>0</td>
<td>X 6</td>
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<td>X 6</td>
<td>0</td>
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<td>Adult Education Performance Improvement Plan (AEPIP) *</td>
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<td>X 4</td>
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</tr>
<tr>
<td>Unexpended Funds from all Adult Education Grants Combined</td>
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</tr>
<tr>
<td># OAG Audit Findings</td>
<td>Upper Quartile</td>
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<tr>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>X 4</td>
<td>0</td>
</tr>
</tbody>
</table>

**AGENCY RISK SCORE:** 224
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
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

Planning
- Define monitoring objectives and methodology
- Identify Risk
- Gather background information
- Create monitoring program
- Send official notification letter

Deskwork
- Gather evidence to accomplish monitoring objectives
- Conduct interviews
- Review documentation processes

Entrance Meeting
- Discuss the monitoring review process
- Explain timing and resources

Exit Meeting
- Discuss monitoring results
- Resolve questions and concerns
- Discuss correction action plan

Reporting
- Communicate monitoring results
- Provide preliminary report for comments
- Obtain corrective action plans
- Distribute final report to appropriate and required individuals

Follow-up
- Review corrective action plan and results
- Interview staff
- Review new process and documentation
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

  - 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

  - 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

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

[Image of email with a link to activate account]
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.
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.

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.

- 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.
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)
### Core Activity 1 - Career and Technical Education

**Objective 1.a - Accountability**

<table>
<thead>
<tr>
<th>Provider Review Protocol</th>
<th>C / E</th>
<th>Citation(s)</th>
<th>Methods of Collection/ Sources of Documentary Evidence</th>
<th>Notes</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>Perkins Sec. 113</td>
<td>Interview Document review:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>F.S. 1004.91(2)</td>
<td>• Student records (selection to be provided by FDOE)</td>
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<tr>
<td></td>
<td></td>
<td>F.A.C. 6A-6.014</td>
<td>• Test proctor certifications</td>
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<tr>
<td>1. Does the provider use approved student assessment systems upon a student's enrollment into a C.T.E. program?</td>
<td>C</td>
<td>Perkins Sec. 113</td>
<td>Interview Document Review:</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>F.S. 1004.91(2)</td>
<td>• Course catalog for C.T.E. programs</td>
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<td>F.A.C. 6A-6.014</td>
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<tr>
<td>2. Does the provider require basic skills requirements for entry into a C.T.E. program?</td>
<td>C</td>
<td>Perkins Sec. 113</td>
<td>Interview Document Review:</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>F.S. 1004.91(2)</td>
<td>• Course catalog for C.T.E. programs</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>F.A.C. 6A-6.014</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Does the provider have written procedures for the collection, verification, analysis and reporting of student data?</td>
<td>C</td>
<td>UGG 200.328(b)(2)</td>
<td>Interview Document Review:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Policies and procedures on data collection and reporting</td>
<td></td>
</tr>
</tbody>
</table>

**Florida Department of Education**

[fdoe.org](http://fdoe.org)
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*
The following elements are required on the inventory of all equipment purchased:

- Description of Property
- Serial Number/ID Number
- The source of the funding
- Title Holder
- Acquisition Date
- Cost of Property

2 C.F.R. 200, Uniform Grant Guidance, 200.313 Equipment: Property records must be maintained that include:

- 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**

<table>
<thead>
<tr>
<th>Acquisition Date</th>
<th>Description of Item</th>
<th>Serial Number</th>
<th>Model Number</th>
<th>Other Identification Number</th>
<th>Unit Cost</th>
<th>Funding Source(s) Including the FAIN</th>
<th>Who holds the title?</th>
<th>% of Cost by Source</th>
<th>Location of Item</th>
<th>Use and Condition</th>
<th>Date of Inventory</th>
<th>Disposition Date</th>
<th>COVID 19 Donated or Loaned</th>
</tr>
</thead>
<tbody>
<tr>
<td>9/28/18</td>
<td>Camcorder</td>
<td>1140512</td>
<td>HDC-CX250</td>
<td>TAG # 1</td>
<td>$1,098.00</td>
<td>Perkins Grant 103-</td>
<td>First Name. Last Name</td>
<td>100%</td>
<td>Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B</td>
<td>New</td>
<td>7/1/20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9/28/18</td>
<td>Camcorder</td>
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<td>HDC-CX250</td>
<td>Tag #2</td>
<td>$1,098.00</td>
<td>Perkins Grant 103-</td>
<td>First Name. Last Name</td>
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<td>Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B</td>
<td>New</td>
<td>7/1/20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9/28/18</td>
<td>Camcorder</td>
<td>1140514</td>
<td>HDC-CX250</td>
<td>Tag #3</td>
<td>$1,098.00</td>
<td>Perkins Grant 103-</td>
<td>First Name. Last Name</td>
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<td>7/1/20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4/15/19</td>
<td>3-D Printer</td>
<td>1142425</td>
<td>HDC-CX250</td>
<td>Tag #4</td>
<td>$1,230.00</td>
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<td>Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B</td>
<td>New</td>
<td>7/1/20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1/19/18</td>
<td>iss Mobile PreK Classpack</td>
<td>1135750</td>
<td>HDC-CX250</td>
<td>Tag #5</td>
<td>$1,040.00</td>
<td>Perkins Grant 103-</td>
<td>First Name. Last Name</td>
<td>100%</td>
<td>Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B</td>
<td>New</td>
<td>7/1/20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1/19/18</td>
<td>iss Mobile PreK Classpack</td>
<td>1135751</td>
<td>HDC-CX250</td>
<td>Tag #6</td>
<td>$1,040.00</td>
<td>Perkins Grant 103-</td>
<td>First Name. Last Name</td>
<td>100%</td>
<td>Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B</td>
<td>New</td>
<td>7/1/20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1/19/18</td>
<td>iss Mobile PreK Classpack</td>
<td>1135752</td>
<td>HDC-CX250</td>
<td>Tag #7</td>
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<td>Perkins Grant 103-</td>
<td>First Name. Last Name</td>
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<td>Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B</td>
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<td>7/1/20</td>
<td></td>
<td></td>
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<tr>
<td>3/21/19</td>
<td>Elec. Countertop Fryer</td>
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<td>Tag# 8</td>
<td>$1,593.59</td>
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<td>First Name. Last Name</td>
<td>100%</td>
<td>Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B</td>
<td>New</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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
Examples of Monitoring Findings
Example - 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.
Example - Monitoring Findings

Example - Monitoring Findings

- 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).
Example - Monitoring Findings

- **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 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)
Tools and Resources


- Florida Department of Education, Quality Assurance and Compliance http://fldoe.org/academics/career-adult-edu/compliance
We welcome your comments, feedback, and suggestions
Thank you!
Quality Assurance and Compliance Team

- Kara Kearce 850-245-9033
- Michael Swift 850-245-9051
- Charles Davis 850-245-9022

Henry Mack, Chancellor
Division of Career and Adult Education

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