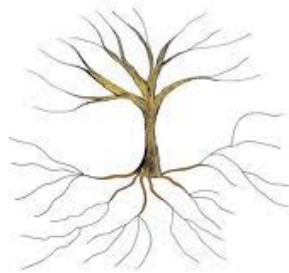# 2013-14
Quality Assurance and Compliance
On-site Monitoring

PROVIDER TRAINING

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Objectives of Conference Call

To provide participants with information regarding grant program monitoring scheduled for <u>Fiscal Year 2013-14</u>

Performance Years and Programs Monitored

- Performance Years (PY) monitored:

  2011-12, 2012-13 and 2013-14

- 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 vision?

- How do we select agencies to monitor?

- Agencies selected for monitoring in 2013-14

- Monitoring strategies and areas of focus

- Pre-visit, onsite, and post-visit activities

Topics, continued

- Items to have available for visit

- Post-visit monitoring report

- Examples of findings and concerns found in onsite monitoring

- Team introduction

- General Q & A

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 vision?

- Is based on project risk

- Is collaborative

- Recognizes positive practices

- Identifies and communicates findings and concerns

- Supports continuous program improvement

Five Risk Assessment Factors

- Total amount of agency grant funding

- Number of grants in fiscal year

- Number of grants with 10% or more of unexpended funds (previous year)

- Previous audit/monitoring findings

- Change in director within last two fiscal years

Risk Assessment Process

- How Risk Factors are Applied

Risk Factor	Criteria Scale	Value	Risk Factor Weight	Total Points
Total amount of Agency funding from grants (2011-12)	$2,000.001+	8	x 6	=___ (48-24)
	$700,001- $2 million	6		
	$300,001- $700,000	5		
	< $300,000	4		

Risk Assessment Process

Change in director example:

Risk Factor	Criteria Scale	Value	Risk Factor Weight	Total Points
Change in program director within the last 2 fiscal years	Yes = 1 No = 0	x 10	x 4	=___ (40 - 0)

Risk Assessment Process

- 2011-12 grant data was used for risk calculations

- Monitoring will address grants from 2011-12 through 2013-14

- Additional programs operated by the provider may be reviewed

- 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 2013-14

- Risk Assessment scores are gathered by type of agency and ranked

- Agencies are divided into fall/spring groups

- Cyclical monitoring applies to:
  - Community Based Organizations (CBOs)
  - Career Technical Student Organizations (CTSOs) Governmental agencies

- Location of provider may influence a visit

Selected Providers 2013-14

Fall Group: September – December

- Brevard County School District (September)

- Madison County School District (October)

- Union County School District (October)

- Bradford County School District (October)

- Broward State College   (November)

- Palm Beach County School District (December)

Monitoring Process

- Pre-visit, on-site and post-visit activities

- Records and data reviews (all phases)

- Direct observation (on-site)

- Interviews (on-site)

Compliance Monitoring Process - continued

- Phone calls, emails

- Referrals

- Resolution Plans

- Corrective Action Plans

Pre-visit Activities

- Notification (personal and correspondence)

- Conference Call - Training for providers (August for fall group, December for spring group)

- Team leader coordination

Pre-visit Activities - continued

Coordination with DOE Team Leader:

- o   Confirmation of agency contact
   (one person per agency)

- o   Coordination and communication with DOE Team Leader

- o   Develop 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 district/county indicating locations of program sites

Information required -continued

- List of all AE and/or CTE program sites including:
  - o Name, address, and zip code
  - o Principal/director name and phone number
  - o Hours of operation

- Agency's list of documents that are required to be contained in a student's record

On-site Activities

- Entrance Conference
  Provider presentations and discussion

- Interviews
  Administrators
  Teachers
  Students
  Staff

- Observations

Onsite Activities - continued

- Records Review (2011-12, 2012-13 and 2013-14):
  Student
  Finance
  Personnel
  Data
  Equipment Inventory
  Perkins Program Improvement
    Plans (if applicable)

- Exit Conference

Have available on the first day…

- Access to records for:

  PY 2011-12

  PY 2012-13

  PY 2013-14

- Policy/handbook for employees

- **PLEASE DO <u>NOT</u> MAKE COPIES!**

First Day - continued

- Handbooks and materials for students (include student enrollment packet)

- Attendance policies

- Recruitment efforts

First Day - continued

- General policies and procedures

- Governing Board and Advisory Committee(s) related documents (may be a procedures manual)

First Day - continued

- Promotional activities and materials for agency's programs

- Written criteria or policies regarding non-discrimination

- Financial policies and procedures including those related to purchasing and procurement of equipment and supplies

First Day - continued

- Local data procedures

- An **inventory of equipment** purchased with the grant(s) funds, **by site**

- **Maps** to each Adult Education and/or Career and Technical Education class location

First Day - continued

- Alert staff to our visit

    Finance Director

    MIS Director

    Other appropriate administrator(s) or principal(s)

- **<u>P.S. We pay for our food and drink!</u>**

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 Reporting

Reporting – 9 Areas of Focus:

- Administration
- Data
- Program and Learning Environments
- Financial
- Facilities and Equipment
- Technology
- Collaboration
- Access and Equity
- Student Perspective

Findings - examples

- Non-discrimination findings

  Authority/Law: [P.L. 88-352], [20 U.S.C. 1681-1683 and 1685-1686], [29 U.S.C. 794], [42 U.S.C. 6101-6107],[PL 110-233]

  o Absence of statements

  o Not broadly posted

  o Genetic Information Nondiscrimination Act of 2008 (GINA) not included in policies, statements

Findings – examples, continued

- Personnel time and effort records findings
  Authority/Law: Office of Management and Budget (OMB) Circulars A-21, A-87 and A-122

  o Lack of personnel timesheets for staff funded by the grant (wholly or in-part)

Findings – examples, 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

Findings – examples, continued

- 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

  o Exposed wires and extension cords
  o Safety rules not posted (e.g., auto, welding)
  o Lack of classroom safety (gasoline, tools, no partition to shop area)

Findings – examples, 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

Findings – examples, continued

- Student records findings

    Authority/Law: The Family Educational Rights and Privacy Act (FERPA)(34 Code of Federal Regulations (CFR) Part 99.31

    o Student records not accessible to compliance team

- Procurement findings

    Authority/Law: 34 CFR 80.36(b) – Procurement Standards

    o Lack of policies and procedures for contracting and/or purchasing goods and services

Concerns - examples

- Programs – significant contrasts within single school environment

- ESOL – students need more class time for practice

- Last minute spending…students must benefit

- No staff development plans

Concerns – examples, continued

- No leadership succession plans
- Lack of coordination among MIS/data, program and financial professionals
- Outdated textbooks
- Lack of classroom supplies
- Lack of advisory committee

Concerns – examples, continued

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

All monitoring reports available on-line:

http://www.fldoe.org/workforce/reports.asp

Total Awarded (2011-12): **$98,837,672**

Unspent:

- AE: School Districts: $1,586,464

  Colleges and University: $316,514

- CTE: School Districts: $1,367,601

  Colleges and University: $587,475

- CBOs: $152,269

- Government Agencies: $90,207

- TOTAL (2011-12): **$4,100,530 = (4.1%)**

Source: Cash Advance and Reporting of Disbursements System (CARDS)

Quality Assurance and Compliance Team

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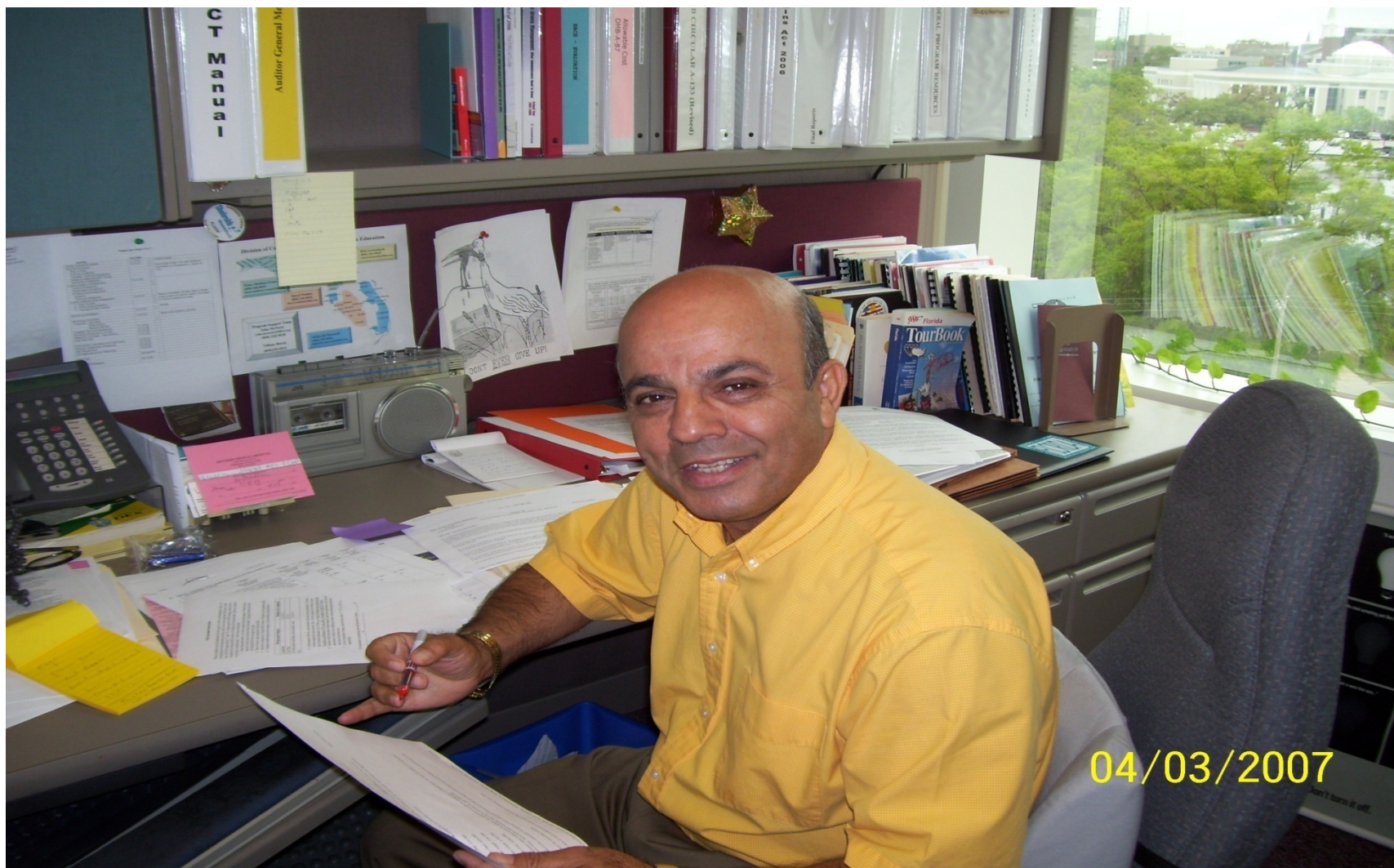Bureau of Grants Administration and Compliance

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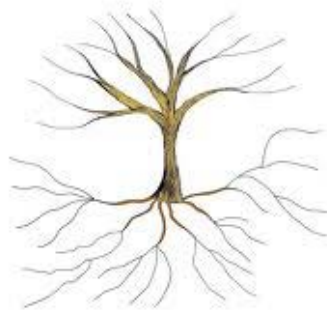
Tashi Williams

Tools and Resources

- Carl D. Perkins Career and Technical Education Act of 2006
http://www.fldoe.org/workforce/perkins/pdf/Perkins_IV_text.pdf

- Adult Education and Family Literacy Act of 1998
http://www2.ed.gov/policy/adulted/leg/legis.html

- U.S. Office of Management and Budget (OMB) Circulars
http://www.whitehouse.gov/omb/circulars/

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

- Quality Assurance Policies, Procedures, and Protocols
http://www.fldoe.org/workforce/compliance.asp

Tools and Resources

- A-133 Compliance Supplement
www.whitehouse.gov/omb/circulars/a133_compliance/06/06toc.html

- Florida Department of Education, Career and Adult, Compliance
http://www.fldoe.org/workforce/compliance.asp

- Florida Department of Education "Green Book"
http://www.fldoe.org/comptroller/gbook.asp

- Grant Award-Terms, Conditions, and Assurances

We welcome your comments,
feedback, and suggestions

Thank you!

[Q & A]