

Workforce Education
Adult Education and Family Literacy
Quality Assurance Policies, Procedures, and Protocols

GENERAL PROVISIONS

Purpose: The purpose of this section is to define the role, authority, philosophy and support of the Division of Workforce Education's responsibility to design, develop and implement a comprehensive Quality Assurance System including monitoring activities, for its federal and state funded grants.

A WAY OF WORK

The Florida Department of Education (FLDOE), Division of Workforce 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 section of the Bureau of Grants Administration and Compliance 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.

The monitoring component of the system is risk-based. Risk assessment is the identification of any event/factor that could have a negative impact on a federal program. In order to complete a risk assessment, certain risk factors have been identified which may affect the level of risk for each program. Providers are ranked on performance indicators; operational risk factors are assessed by using a Risk Matrix; and, critical factor reviews and ratings are completed.

PURPOSE OF MONITORING

The purpose of monitoring is to identify the specific areas in which a provider is in compliance or non-compliance with federal law and regulations, state statutes and rules, the Office of Management and Budget (OMB) circulars, and conditions of the grant(s). The timely identification of non-compliance provides a framework to make changes that are expected to result in programs becoming more efficient and effective. However, a comprehensive and multi-dimensional Quality Assurance System is a foundation for continuous improvement of services and systems both internally and externally. Our commitment to excellence supports accountability, collaboration, targeted technical assistance, continuous improvement, and positive systemic change.

Compliance monitoring is intended to provide information that will support the provider's assurance that the organization is in compliance with the applicable laws and regulations, statutes and rules. Some components to be addressed include:

- administrative systems to manage the grant and its funds
- services are being delivered according to the grant's terms and conditions
- projected targets for the performance indicators are being met
- data collection, recording, and reporting processes are appropriate

Using the methods and tools for compliance monitoring, the Quality Assurance Team shall verify that the provider is complying with at least the following terms where applicable:

- delivering the approved services
- meeting regulatory requirements
- serving the defined target population
- the students being served are eligible to receive services
- staff meets prescribed professional qualifications
- equipment acquired under the grant is inventoried on a regular basis
- student records are current and complete
- fiscal requirements are met

AUTHORITY

The Florida Department of Education receives federal funding from the US Department of Education for Adult Education and Family Literacy under the Adult Education and Family Literacy Act of 1998. FLDOE awards sub grants to eligible providers to administer local programs. FLDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for Adult Education/Family Literacy, as specified in 34 CFR 76.770, 34 CFR 80.40 of the Education Department General Administrative Regulations (EDGAR), OMB Circular A-133, §____.400, and §215.86, Florida Statutes.

Part 74 – Administration of grants and agreements with institutions of higher education, hospitals, and other non-profit organizations. §74.1 Purpose (a) This part establishes uniform administrative requirements for Federal grants agreements awarded to institutions of higher education, hospitals and other non-profit organizations...

(d) Non-profit organizations that implement Federal programs for the States are also subject to the State requirements. (Authority: 20 U.S.C. 1221e-3, 3474; OMB Circular A-110)

Part 76 - State Administered Programs. 34 CFR 76.1 "Programs to which part 76 applies.

(a) The regulations in part 76 apply to each State-administered program of the Department."

34 CFR 76.770 "A State shall have procedures to ensure compliance. 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."

Part 80 - Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, 34 CFR 80.1 "Purpose and scope of this part. This part establishes uniform administrative rules for federal grants and cooperative agreements and sub awards to State, local and Indian tribal agreements."

80.40 "Monitoring and reporting program performance. (a) Monitoring by providers. Providers are responsible for managing the day-to-day operations of grant and sub grant supported activities. Providers must monitor grant and sub grant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Provider monitoring must cover such program, function or activity."

OMB Circular A-133- Subpart D--Federal Agencies and Pass-Through Entities, §____.400 Responsibilities. ... "(d) Pass-through entity responsibilities. A pass-through entity shall perform the following for the Federal awards it makes:... (3) Monitor the activities of sub recipients as necessary to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved."

§215.86, Florida Statutes (F.S.), "Management system and controls.—Each state agency and the judicial branch as defined in §216.011, F.S., shall establish and maintain management systems and controls that promote and encourage compliance; economic, efficient, and effective operations; reliability of records and reports; and safeguarding of assets. Accounting systems and procedures shall be designed to fulfill the requirements of generally accepted accounting principles."

§1008.32, F.S., addresses the responsibility of the State Board of Education for oversight and enforcement relative to compliance.

The Project Application and Amendment Procedures for Federal and State Programs (Green Book)

Financial and Program Cost Accounting and Reporting for Florida Schools (Red Book)

RESEARCH STATE AND NATIONAL TRENDS

Quality Assurance staff conducted a comprehensive review of various monitoring systems to identify current trends and models for compliance monitoring for Adult Education and Family Literacy programs. A review of the following systems was completed: Arizona, California, Colorado, Connecticut, Georgia, Kentucky, Massachusetts, Michigan, New York, Pennsylvania, Vermont, and the U.S. Department of Education, Florida's Department of Children and Families (DCF) and Florida's Auditor General's office.

Each of the entities reviewed reinforces the approach that compliance monitoring must: ensure that programs meet federal and state regulatory requirements; address non-compliance; provide technical assistance; and engage in continuous program improvement activities.

STRATEGIC IMPERATIVE

The FLDOE operates within the following guiding principles: a coordinated K-20 seamless system, student-centered, access, equity, academic excellence, and flexibility. Strategic focus areas have also been developed to assist the Department in long range planning efforts. The Division of Workforce Education specifically addresses the following strategic focus areas:

1. Strengthen Foundation Skills, and
2. Improve College and Workforce Readiness.

OPERATIONAL STANDARDS – ROLES AND RESPONSIBILITIES

The Office of Management and Budget (OMB) Circular A-133 requires that the FLDOE, Division of Workforce Education monitor the activities of sub grantees or providers, to ensure that performance goals are achieved and federal funds are expended for authorized purposes. Monitoring will support compliance with federal laws and regulations, state statutes and rules, and the provisions of an approved grant award. A Quality Assurance System includes various monitoring strategies such as: phone calls, e-mails, conference calls, video conferences, grants application reviews, self assessment, and completion of self-monitoring activities, records reviews, targeted technical assistance, system improvement plans/corrective action plans, onsite visits, verification, and/or referrals for fiscal or data reviews.

Quality Assurance staff is expected to coordinate and complete compliance monitoring in accordance with the system requirements and within approved time frames. Staff is required to render impartial and unbiased judgments in the review of provider compliance with the terms and conditions specified in the approved grant award, as well as applicable state and federal laws.

Quality Assurance staff is expected to demonstrate, model, and reinforce the values of integrity, accountability, quality, urgency, responsiveness, personal responsibility, courtesy, collaboration, and innovation. Staff will demonstrate these values at all times in their interactions with co-workers, supervisors, providers and other stakeholders; in their personal contributions for work assignments and projects; and when representing the Division of Workforce Education and the Florida Department of Education.