



# SPRING 2015 Provider Training

Quality Assurance and Compliance Onsite Monitoring



[www.FLDOE.org](http://www.FLDOE.org)

# **FACILITATORS**

Gloria Spradley-Brown, Bureau Chief  
Tashi Williams, Compliance Specialist

Quality Assurance and Compliance Section  
Division of Career and Adult Education  
850-245-9051

## Objectives of Conference Call

To provide participants with information regarding grant program monitoring scheduled for Fiscal Year 2014-15



# Fiscal Years and Programs Monitored

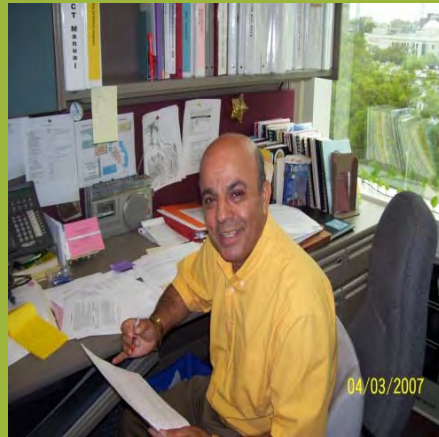
- Fiscal Years (FY) monitored:  
2012-13, 2013-14 and 2014-15
- Grant Programs to be monitored:  
Adult Education (AE)  
Carl D. Perkins (CTE)

## Topics to be covered on the Call

- Why do we monitor and what is our way of work?
- Enhancements to the 2014-15 Risk Assessment
- How do we select agencies to monitor?
- Agencies selected for monitoring in 2014-15
- Monitoring strategies and areas of focus
- Pre-visit, on-site, and post-visit activities
- Items to have available for visit
- Post-visit monitoring report
- Examples of findings and concerns found in onsite monitoring
- Team introduction
- General Q & A

# Quality Assurance and Compliance Staff

Dr. Shahrokh Massoudi



Donna Waller



Tashi Williams



## 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 Way of Work?

- Is based on project risk
- Is collaborative
- Recognizes positive practices
- Identifies and communicates findings and concerns
- Supports continuous program improvement



# Quality Assurance

## 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,
- Supports systemic and continuous program improvement

## **Risk Assessment Factors 2014-15**

### Risk Matrix – Operational Risk Factors (Metrics)

- Number of grants
  - Total amount of agency funding
  - Number of grant funds remaining
  - \* Program Improvement Plan (PIP)
  - Audit/monitoring findings
  - Change in director
- \* Denotes new data element

# 2014-15

## Quality Assurance Enhancements

- Perkins Program Improvement Plan Index
- 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 2014-15

## 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, Districts, Non-College/Non-District Receiving Carl D. Perkins Grants**

**Agency Name: Sunshine State College**

**Target Year: 2012-2013 (Monitoring Year 2014-2015)**

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)
Total Budget for all Perkins Grants Combined	Upper Quartile	7	5	X 10	50
	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			
*3-year Perkins Improvement Plan (PIP) Index	7.50 – 10.00	7	0	X 8	0
	5.00 – 7.49	5			
	2.50 – 4.99	3			
	0<index<2.50	1			
	0	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			
<i>*Data sources used for calculations: Prior to July 1, 2013</i>				<b>AGENCY RISK SCORE:</b>	<b>164</b>

## Risk Assessment Process

- 2012-13 grant data was used for risk calculations
- Monitoring will address grants from 2012-13 through 2014-15
- Additional programs in the geographical area may also be reviewed/monitored

## IMPORTANT!

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



## Provider Selection 2014-15

- Agencies with the highest risk matrix may be targeted for monitoring
- Monitor both CTE and Adult Ed
- Various monitoring strategies are implemented



## Quality Assurance

- Targeted providers for on-site Monitoring Spring 2014-2015 have been notified:
  - Ace of Florida, Inc.
  - Collier County School District
  - Dade County School District
  - Manatee County School District
  - Pasco County School District
  - Daytona State College
  - Palm Beach State College

## Monitoring Process

- Pre-visit, on-site and post-visit activities
- Records and data reviews (all phases)
- Direct observation (on-site)
- Interviews (on-site)
- Phone calls, emails
- Referrals
- Resolution Plans:
  - Corrective Action Plans (Findings)
  - Action Plan (Concerns)

## Pre-visit Activities

- Notification (personal and correspondence)
- Conference Call - Training for providers (August for fall group, December for spring group)
- Team leader coordination
- Coordination with DOE Team Leader:
  - Confirmation of agency contact (one person per agency even if Adult Education and CTE programs are monitored)
  - Coordination and communication with DOE Team Leader
  - Develop visit 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 the district/county indicating locations of program sites
- List of all AE and/or CTE program sites including:
  - Name, address, and zip code
  - Principal/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 record

## On-site Activities

- Entrance Conference – 1 hour maximum
  - Provider presentations optional
  - Discussion of monitoring
- Interviews
  - Administrators
  - Teachers
  - Students
  - Staff
- Observations
- Records Review (2012-13, 2013-14 and 2014-15):
  - Student
  - Finance
  - Personnel
  - Data
- Equipment Inventory (have them ready per **EDGAR** specifications)
- Perkins Program Improvement
- Plans (if applicable)
- Exit Conference

## Have available on the first day...

- Access to records for:
  - FY 2012-13
  - FY 2013-14
  - FY 2014-15
- 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
- Governing Board and Advisory Committee(s) related documents (may be a procedures manual)

## First Day - continued

- Recruitment 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 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 Adult Education and/or Career and Technical Education class location
- Alert staff to our visit
  - Finance Director
  - MIS Director
- Other appropriate administrator(s) or principal(s)
- **P.S. We pay for our food and drink!**

## 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 Report

## Areas of Focus:

- Administration
- Data
- Learning Environments
- Student Perspective
- Curriculum and Instruction
- Financial
- Records Review
- Technology and Equipment
- Collaboration

## Common Findings

- Genetic Information Nondiscrimination Act (GINA) of 2008 -  
The protection from discrimination based on genetic information
  - For further information about GINA go to:  
<http://www.eeoc.gov/laws/types/genetic.cfm>
- 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]

## Common Findings, continued

- Non-discrimination findings:
  - Absence of statements
  - Not broadly posted
  - GINA not included in policies, statements
- 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

- Exposed wires and extension cords
- Safety rules not posted (e.g., auto, welding)

## Common Findings, 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
- Student records findings  
Authority/Law: The Family Educational Rights and Privacy Act (FERPA)(34 Code of Federal Regulations (CFR) Part 99.31
  - Student records not accessible to compliance team

## Common Findings, continued

- Procurement findings
  - Authority/Law: 34 CFR 80.36(b) – Procurement Standards
    - Lack of policies and procedures for contracting and/or purchasing goods and services
- 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

## Common Concerns

- 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
- No leadership succession plans
- Lack of coordination among MIS/data, program and financial professionals

## Common Concerns- Continued

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

## Monitoring Reports

- All monitoring reports are available online:

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



## Quality Assurance and Compliance Team

Dr. Shahrokh Massoudi – (850) 245-9056

Donna Waller – (850) 245-9025

Tashi Williams – (850) 245-9051

Rod Duckworth, Chancellor

Division of Career and Adult Education

Gloria Spradley-Brown, Chief

Bureau of Grants Administration and Compliance

## Tools and Resources

- Carl D. Perkins Career and Technical Education Act of 2006  
[http://www.fldoe.org/workforce/perkins/pdf/Perkins\\_IV\\_text.pdf](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>

## Tools and Resources- continued

**(New) Omni-Super Circular** coming July 1, 2015

- Quality Assurance Policies, Procedures, and Protocols

<http://www.fldoe.org/workforce/compliance.asp>

- A-133 Compliance Supplement

[www.whitehouse.gov/omb/circulars/a133\\_compliance/06/06toc.html](http://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

## [ Q & A ]

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

