SPRING 2015 Provider Training

Quality Assurance and Compliance Onsite Monitoring

www.FLDOE.org

© 2014, Florida Department of Education. All Rights Reserved.
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

<table>
<thead>
<tr>
<th>Risk Quartile</th>
<th>Weight</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>
<td>1</td>
</tr>
<tr>
<td>Zero</td>
<td>0</td>
</tr>
</tbody>
</table>
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)

<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>Total Budget for all Perkins Grants Combined</td>
<td>Upper Quartile</td>
<td>7</td>
<td>5</td>
<td>X 10</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>Upper Middle</td>
<td>5</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lower Middle</td>
<td>3</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lower Quartile</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Perkins Grants</td>
<td>4+</td>
<td>7</td>
<td>7</td>
<td>X 8</td>
<td>56</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>5</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>3</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>*3-year Perkins Improvement Plan (PIP) Index</td>
<td>7.50 – 10.00</td>
<td>7</td>
<td>7</td>
<td>X 8</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>5.00 – 7.49</td>
<td>5</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.50 – 4.99</td>
<td>3</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0&lt;index&lt;2.50</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agency CTE Program Director</td>
<td>Yes</td>
<td>7</td>
<td>7</td>
<td>X 6</td>
<td>42</td>
</tr>
<tr>
<td>Change from Previous Fiscal Year</td>
<td>No</td>
<td>0</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unexpended Funds from all Perkins Grants Combined</td>
<td>Upper Quartile</td>
<td>7</td>
<td>1</td>
<td>X 4</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Upper Middle</td>
<td>5</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lower Middle</td>
<td>3</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lower Quartile</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td># OAG Audit Findings</td>
<td>Upper Quartile</td>
<td>7</td>
<td>3</td>
<td>X 4</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>Upper Middle</td>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lower Middle</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Lower Quartile</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Data sources used for calculations: Prior to July 1, 2013

**AGENCY RISK SCORE:** 164
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:
  o Name, address, and zip code
  o Principal/director name and phone number
  o 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
  • 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
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
    o Exposed wires and extension cords
    o Safety rules not posted (e.g., auto, welding)
Common Findings, continued

• Property inventory findings
  Authority/Law: EDGAR, Section 80.32 Equipment, (d) (1)
  o Incomplete or lack of inventory for equipment
  o Property not properly tagged
  o Lack of procedures for properly disposing certain inventory items

• Student records findings
  o 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

- 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)
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

• 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!