

Department of Education
Office of Inspector General – Internal Audit
Six-Month Status Report on: Miami-Dade County School District – Adults with Disabilities
Report # A-1819-022 Issued: October 22, 2019
Status as of April 22, 2020

| Finding | Recommendation(s) | Management Response as of October 22, 2019 | Management Response as of April 22, 2020 | Anticipated Completion Date & Contact |
|--|--|--|---|--|
| The monitoring plan was insufficient for a high risk grant. | We recommend DVR ensure the monitoring plans reflect sufficient activities to monitor high risk providers. In addition, we recommend DVR promptly provide the monitoring results and recommendations for improvement to the MDCSD and ensure corrective action has been initiated on noted deficiencies. | DVR is in the process of developing monitoring tools that are specific to the AWD Grants to ensure monitoring and compliance with performance requirements, terms and conditions of the Adult with Disabilities Grant Program. | The Division is currently working on revamping the the monitoring plans associated with this and Adults with Disabilities Grants. | Anticipated completion by July 1, 2020. |
| Documentation of AIEPs was inconsistent and the AIEPs did not always include all required information. | We recommend DVR include a review of the AIEPs in their monitoring activities to ensure consistency and compliance with the grant terms. | DVR will ensure that the monitoring analysis and review includes a sample selection of AIEPs for the enrolled students. | This monitoring component will be included in the revised monitoring plan. | Anticipated completion by July 1, 2020. |

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| <p>DVR did not require the MDCSD to report on their participants' completion of benchmarks in accordance with grant terms.</p> | <p>We recommend DVR review the grant language to determine the intent of the grant and modify language appropriately. If the grant language remains unchanged, we recommend DVR ensure deliverables are met on a quarterly basis through review of AIEPs and progress reports from the MDCSD.</p> | <p>DVR will communicate with the DOE Grants Office to determine options for amendment. In addition, DVR will monitor and review a sample of AIEPs and student's progress to include completion status during each quarterly monitoring.</p> | <p>The changes to modify the grant language related to the completion of the benchmarks are still in progress, the changes will be reflected in the upcoming grant year.</p> | <p>Anticipated completion by July 1, 2020.</p> |

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| <p>Documentation of AIEPs was inconsistent and the AIEPs did not always include all required information.</p> | <p>We recommend that the MDCSD ensure all sites complete the AIEPs in accordance with grant terms.</p> | <p>As we concur with the findings from the small sample identified out of compliance, we would like to state that M-DCPS has been a grant receiver since the year 2000. All reporting requirements stated through the Project Performance Accountability Form within the grant have been approved annually. As stated in the audit findings on page 1 and page 4, DVR has never requested what was cited or provided any guidance to our AIEP compliance forms. Prior guidance or discussion from DVR would have allowed us the opportunity to take corrective action measures and not be of the mindset that all complied on an annual basis.</p> | <p>As we concur with the findings from the small sample identified out of compliance, we would like to state that M-DCPS has been a grant receiver since the year 2000. All reporting requirements stated through the Project Performance Accountability Form within the grant have been approved annually. As stated in the audit findings on page 1 and page 4, DVR has never requested what was cited or provided any guidance to our AIEP compliance forms. Prior guidance or discussion from DVR would have allowed us the opportunity to take corrective action measures and not be of the mindset that all complied on an annual basis.</p> | <p>Completion of remaining face-to-face document audits is unknown due to school closures.</p> |

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| | | Action Steps: <ul style="list-style-type: none"> • Training on AIEP development-Completed Sept. 6, 2019 • Review of documents for quarterly report submission-Scheduled for Monday, October 7, 2019, Monday, January 6, 2020, Monday, April 6, 2020 and Monday, June 22, 2020 • Formulate audit checklist for principals to use for compliance spot checks at AWD sites, September 2019 • Quarterly meeting calendar created with principals and school-based program managers for the AWD grant, September 2019 • District-based AWD records audit at the nine grant recipient schools, October 2019 | Action Steps: <ul style="list-style-type: none"> • Training on AIEP development-Completed Sept. 6, 2019 • Review of documents for quarterly report submission-Scheduled for Monday, October 7, 2019 - Completed, Monday, January 6, 2020 - Completed, Monday, April 6, 2020 (Pending due to school closures) and Monday, June 22, 2020 • Formulate audit checklist for principals to use for compliance spot checks at AWD sites, September 2019 - Completed • Quarterly meeting calendar created with principals and school-based program managers for the AWD grant, September 2019 – Completed (See attachment) | |

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| | | | <ul style="list-style-type: none"> District-based AWD records audit at the nine grant recipient schools, October 2019 – Internal audits completed 3 Face-to-Face audits completed (See attachments) | |
| <p>DVR did not require the MDCSD to report on their participants’ completion of benchmarks in accordance with grant terms.</p> | <p>We recommend the MDCSD ensure that participants complete the benchmarks in accordance with grant terms and ensure the AIEPs reflect the achievement of benchmarks.</p> | <p>As we concur with the findings from the small sample out of compliance, we would like to state that M-DCPS has been a grant receiver since the year 2000. All reporting requirements stated through the Project Performance Accountability Form within the grant have been approved annually. As stated in the audit findings, on pages 1 as well as page 6, DVR does not require that M-DCPS submit documentation that demonstrates goal achievement. What is mandated for submission is the attendance records, quarterly</p> | <p>As we concur with the findings from the small sample out of compliance, we would like to state that M-DCPS has been a grant receiver since the year 2000. All reporting requirements stated through the Project Performance Accountability Form within the grant have been approved annually. As stated in the audit findings, on pages 1 and page 4, DVR has never requested what was cited or provided any guidance to our AIEP compliance forms. Prior</p> | <p>Completion of remaining face-to-face document audits is unknown due to school closures.</p> |

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| | | <p>student progress report, ASNAP summary report and employment outcomes. Prior guidance or discussion from DVR would have allowed us the opportunity to make corrective action measures and not be of the mindset that all complied on an annual basis.</p> <p>Action Steps:</p> <ul style="list-style-type: none"> • Training on AIEP development-Completed Sept. 6, 2019 • Review of documents for quarterly report submission-Scheduled for Monday, October 7, 2019, Monday, January 6, 2020, Monday, April 6, 2020 and Monday, June 22, 2020 • Formulate audit checklist for principals to use for compliance spot checks at AWD sites, September 2019 | <p>guidance or discussion from DVR would have allowed us the opportunity to make corrective action measures and not be of the mindset that all complied on an annual basis.</p> <p>Action Steps:</p> <ul style="list-style-type: none"> • Training on AIEP development-Completed Sept. 6, 2019 • Review of documents for quarterly report submission-Scheduled for Monday, October 7, 2019 - Completed, Monday, January 6, 2020 - Completed, Monday, April 6, 2020 (Pending due to school closures) and Monday, June 22, 2020 • Formulate audit checklist for principals to use for compliance spot checks at | |

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| | | <ul style="list-style-type: none"> • Quarterly meeting calendar with principals and school-based program managers for the AWD grant, October 2019 • District-based AWD records audit at the nine grant recipient schools, November 2019 | AWD sites, September 2019 - Completed <ul style="list-style-type: none"> • Quarterly meeting calendar with principals and school-based program managers for the AWD grant, October 2019 – Completed (See attachment) • District-based AWD records audit at the nine grant recipient schools, November 2019– Internal audits completed 3 Face-to-Face audits completed (See attachments) | |