

Quality Assurance and Compliance Desk Monitoring Review for Career and Technical Education

Florida Technology Students Association and Foundation, Inc.

February 13-17, 2017

Final Report



State Board of Education

Marva Johnson, Chair Andy Tuck, Vice Chair Members Gary Chartrand Tom Grady Rebecca Fishman Lipsey Michael Olenick Pam Stewart
Commissioner of Education

Rod Duckworth, Chancellor Division of Career and Adult Education

June 23, 2017

Richard Platt, Executive Board Chair Florida Technology Students Association & Foundation, Inc. 1200 37th Ave E. Bradenton, Florida 34208

Dear Mr. Platt:

We are pleased to provide you with the final monitoring report for the career and technical education student organization, Florida Technology Students Association & Foundation, Inc. The final report will also be placed on the Quality Assurance and Compliance website at http://fldoe.org/academics/career-adult-edu/compliance.

We appreciate the leadership and professionalism demonstrated by your staff during our visit. If we can be of any assistance, please contact Tashi D. Williams, director of Quality Assurance and Compliance, at 850-245-9033 or <u>Tashi.Williams@fldoe.org</u>.

Thank you for your continuous commitment to improve educational services for Florida's students.

Sincerely,

Rod Duckworth

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Enclosure

cc: Justin Lauer, executive director, FL Technology Students Association & Foundation, Inc. Gloria Spradley-Brown, bureau chief, Grants Administration and Compliance Tashi D. Williams, director, Quality Assurance and Compliance LaStacia Spencer, program specialist, Quality Assurance and Compliance

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Florida Department of Education Division of Career and Adult Education

Florida Technology Students Association and Foundation, Inc. Career and Technical Education Ouality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Florida Department of Education (FLDOE), Division of Career and Adult 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 and Compliance section 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.

II. AUTHORITY

The FLDOE receives federal funding from the U.S. Department of Education (USDOE) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Career and Technical Education Act of 2006, and for Adult Education (AE) under the Workforce Innovation and Opportunity Act (WIOA) of 2014. 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 CTE and Adult Education/Family Literacy. 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 pursuant to 34 CFR 76.770, Education Department General Administrative Regulations (EDGAR) and the Uniform Grant Guidance (UGG) for grant awards issued on or after December 26, 2014. The Florida Department of Education, Division of Career and Adult Education, is required to oversee the performance of subgrantees in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes).

Additional citations noting pertinent laws and regulations and authority to monitor are located in the 2016-2017 Quality Assurance Policies, Procedures, and Protocols, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES AND PROTOCOLS

The Quality Assurance Policies, Procedures and Protocols manual was revised in the 2016-17 program year. The manual is provided to each provider prior to the monitoring visit. The manual provides a summary of each facet of the monitoring design and the process. It also contains protocols that may be used as agencies are monitored or reviewed. References may be made to the manual in this document; it is located on the division's website at http://fldoe.org/academics/career-adult-edu/compliance.

IV. PROVIDER SELECTION

Various sources of data are used throughout the implementation of the quality assurance system. The monitoring component of the system is risk-based. Risk assessment is a process used to evaluate variables associated with the grants and assign a rating for the level of risk to the department and the division. A

risk matrix, identifying certain operational risk factors is completed for each provider. The risk matrix for each program monitored is located in Appendix A. The results of the risk assessment process and consideration of available resources are used to determine one or more appropriate monitoring strategy(ies) to be implemented.

The Quality Assurance and Compliance section may apply any specific monitoring strategy to any federal or state-funded provider at any time. There may be circumstances that may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

The monitoring strategy for Florida Technology Students Association and Foundation, Inc. (FL TSA) was determined to be a desk monitoring review. Notification was sent to Mr. Anthony Rodriguez, chairman, on January 13, 2017. The designated representative for the agency was Mr. Justin Lauer, executive director. During the course of the review, the Chairman of the Board of Directors changed to Mr. Richard Platt.

The desk monitoring review for the agency was conducted on February 13-17, 2017 by a representative of the Quality Assurance and Compliance section of the division: LaStacia Spencer, program specialist.

V. Florida Technology Students Association and Foundation, Inc.

The provider was awarded the following grants for FYs 2014 -15, 2015-16 and 2016 -17:

FY	20	14	_1	5
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<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins – State Leadership	189-1625A-5PL01	\$ 46,212.00	\$ 0.00
FY 2015-16			
<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins – State Leadership	189-1626A-6PL01	\$ 47,971.00	\$ 0.00
FY 2016-17			
<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins – State Leadership	189-1627A-7PL01	\$ 53,979.00	N/A

Additional information about the provider may be found at the following web address: http://floridatsa.com/

VI. MONITORING ACTIVITIES

The desk monitoring review activities included administrative, financial and deliverable review and an exit conference call.

Exit Conference

The exit telephone conference was conducted by conference call on May 16, 2017. The participants are listed below:

Name	Title
Justin Lauer	Executive Director
FDOE MONITORING TEAM	

Tashi Williams	Program Director, FLDOE
LaStacia Spencer	Program Specialist, FLDOE

Records Review

Program, financial and administrative records were reviewed. A complete list is provided in section VII, item B. Some policies and procedures were also reviewed.

VII. RESULTS

- **A.** <u>ADMINISTRATION</u> refers to the management and/or supervision of programs, structure of programs and services, grant oversight and other administrative areas.
 - FL TSA collaborates with the Florida Technology Students Association and the Florida Technology Student Alumni Association in order to facilitate the annual leadership conference and state conference and competition for middle and high school students.
 - FL TSA is governed by a board of directors that includes the President of the Florida Technology Student Alumni Division, members appointed by the State Program Director for Technology Education, former or active advisors of Florida Technology Student Association chapters and other nonvoting members, such as the President of the Florida Technology Student Association, the FL TSA Executive Director and the FLDOE Program Specialist for Technology Education.
 - FL TSA contracts an outside company, Titanium Endeavors, LLC, to fulfill the roles of Executive Director, State Conference Manager, Leadership Conference Manager, Conference Judge Manager and Conference Computer Manager.
 - The Executive Director is indicated as the agency head and is responsible for grant management and submission of grant deliverables to FLDOE.
- **B.** <u>RECORDS REVIEW</u> refers to a review of the records and documents that demonstrate compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.
 - FY 2014-15 Carl Perkins State Leadership Grant Application
 - Bylaws of the FL TSA
 - Bylaws of the Florida Technology Student Association
 - FL TSA Accounting Policies and Procedures Manual
 - Quarterly Activity Report with deliverables and supporting documentation
 - FY 2014-15 Board of Directors meeting minutes
 - November 2016 Board of Directors meeting minutes
- **C. FINANCIAL** refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management and allowable costs.
 - Quarterly Activity Reports of grant deliverables and supporting documentation was reviewed and satisfied the requirements for payment.
 - FL TSA has written financial policies and procedures that were reviewed.
 - FL TSA maintains a separate bank account exclusively for grant funds received from FLDOE.
 - 2014-15 checks were reviewed and did not follow the guidelines outlined within the FL TSA Accounting Policies and Procedures Manual (Section 9 Check Signing Authority).

FINDING AND RECOMMENDATION:

- Finding C1: Lack of general oversight concerning federal funds (UGG 2 CFR 200.303, Internal Controls). Agency failed to adhere to its policies for check signing as follows:
 - Checks greater than \$5,000 but less than \$10,000 requires one authorized signature and written approval from a second authorized signature
 - Checks greater than \$10,000 requires two signatures, one of which must be that of either the Association Board, Treasurer, or other authorized Board member. The second signature can be that of the Board or the Treasurer
 - o Corrective Action C1: FL TSA must follow the guidelines as set in the agency's Accounting Policies and Procedures Manual.

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER TECHNICAL EDUCATION

- 1. Corrective Action Plan (findings) Florida Technology Students Association and Foundation, Inc. is required to complete a corrective action plan.
- 2. Action Plan (concerns) Florida Technology Students Association and Foundation, Inc. is not required to complete an action plan.

IX. SUMMARY

Once the desk monitoring review is completed, including receipt of requested information, a draft report will be forwarded to the provider for review. Comments are accepted and considered. The final report will be completed, forwarded to the Chairman of the Board of Directors with a copy to the appropriate parties, and posted on the department's website at the following address: http://fldoe.org/academics/career-adult-du/compliance.

The division will issue a closure notice to the Chairman of the Board of Directors and designated contact person. This notice indicates all outstanding resolution items have been completed.

On behalf of the department, the members of the Quality Assurance and Compliance section extend our appreciation to all participants in the FL TSA desk monitoring review. Special thanks are offered to Mr. Justin Lauer for his participation and leadership during this process.

APPENDIX A

Florida Technology Students Association and Foundation, Inc.
Career and Technical Education
Risk Matrix

Risk Scores Matrix for Non-Colleges Receiving Career and Technical Education (CTE) Carl D. Perkins Grants

Agency Name: FLORIDA TECHNOLOGY STUDENTS ASSOCIATION AND FOUNDATION,

INC.

Program type: CAREER AND TECHNICAL EDUCATION

Target Year: **2014-2015**Monitoring Year: **2016-2017**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
/D / LD 11	Upper Quartile	7	5		50
Total Perkins	Upper Middle	5		V 10	
Budget Allocated	Lower Middle	3		X 10	
Value	Lower Quartile	1			
	4+	7			
# Dauling Cuants	3	5			8
# Perkins Grants	2	3	1	X 8	
Value	1	1			
	0	0			
Perkins	Yes	7			
Director Change Value	No	0	0	X 6	0
	Upper Quartile	7	0	X 4	
Perkins Funds	Upper Middle	5			
Remaining Point	Lower Middle	3			0
Value	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					58

^{*}Compliance monitoring last visit: N/A

^{*&}lt;u>Data sources used for calculations:</u> Prior to July 1, 2015

APPENDIX B Florida Technology Students Association and Foundation, Inc. Resolution Action Plan

T: 11			Person	Projected Date of	
Finding	Corrective Action	Agency Response	Responsible	Completion	
C1: Lack of general	FL TSA must follow the	FL TSA will follow	FL TSA	November 15,	
oversight concerning federal	guidelines as set in the	this policy going	Treasurer –	2017	
funds (UGG 2 CFR	agency's Accounting	forward with the 2017-	Maria		
200.303, Internal Controls).	Policies and Procedures	18 grant year since no	Behnken		
Agency failed to adhere to	Manual.	remaining checks will			
its policies for check signing		be written between			
as follows:		now and June 30 th			
 Checks greater than 		from the grant account.			
\$5,000 but less than					
\$10,000 requires					
one authorized					
signature and					
written approval					
from a second					
authorized signature					
 Checks greater than 					
\$10,000 requires					
two signatures, one					
of which must be					
that of either the					
Association Board,					
Treasurer, or other					
authorized Board					
member. The					
second signature					
can be that of the					
Board or the					
Treasurer					
Plan submitted by (name an	d title): Justin Lauer, Execu	itive Director	Date: 0	05/25/2017	
Plan accented by LaStacia	Spencer Program Specialist	t IV Date: 06/07/2017			
Status of Action Plan (to be completed by FLDOE staff): Checks will be monitored through the first quarter of FY 2017-18 to ensure that policies are being followed.					
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Date:		Status of Plan Completion:			