

Quality Assurance and Compliance Desk Monitoring Review for Perkins Career and Technical Student Organizations

Florida Collegiate DECA, Inc.

September 23-27, 2019

Final Report

TABLE OF CONTENTS

I.	Introduction]
II.	Authority	1
III.	Quality Assurance Policies, Procedures, and Protocols	1
IV.	Provider Selection	1
V.	Florida Collegiate DECA, Inc.	2
VI.	Monitoring Activities	3
VII.	Results	3
VIII.	Required Resolution Activities	4
IX.	Summary	4
	Appendix A	5

Florida Department of Education Division of Career and Adult Education

Florida Collegiate DECA, Inc. Perkins Career and Technical Student Organization (CTSO) Quality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Florida Department of Education (FDOE), 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 (QAC) 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 FDOE receives federal funding from the U.S. Department of Education (USDOE) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Strengthening Career and Technical Education for the 21st Century Act, and for Adult Education (AE) under the Workforce Innovation and Opportunity Act (WIOA) of 2014. FDOE awards sub-grants to eligible providers to administer local programs. FDOE 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 sub-grantees 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 2019-2020 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 2019-20 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 QAC 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 Florida Collegiate DECA, Inc. (DECA) was determined to be a desk monitoring review. Notification was sent to Mr. James Benedict, executive director, Florida Collegiate DECA on August 7, 2019. The designated representative for the agency was also Mr. James Benedict.

The desk monitoring review was set to take place September 23-27, 2019, by a representative of the Quality Assurance and Compliance section of the division: Mr. Michael Swift, program specialist.

V. FLORIDA COLLEGIATE DECA, INC.

The provider was awarded the following grants for FY's 2017-18, 2018-19 and 2019-20:

<u>Finance</u>			
FY 2017-18			
Grants	Grant Number	Grant Amount	Unexpended
Perkins - CTSO	59A-1628A-8PL01	\$ 15,696.00	\$ 156.96
FY 2018-19			
Grants	Grant Number	Grant Amount	<u>Unexpended</u>
Perkins - CTSO	59A-1629B-9PL01	\$ 15,590.00	\$ 0.00
FY 2019-20			
Grants	Grant Number	Grant Amount	<u>Unexpended</u> *
Perkins - CTSO	59A-1620B-0PL01	\$ 15,129.00	\$ N/A

^{*} FY 2019-20 final project disbursement reports will not be available until the end of the program year.

Additional information about the provider may be found at the following web address: www.fldeca.org

VI. MONITORING ACTIVITIES

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

Exit Conference

The exit telephone conference was conducted via conference call on March 4, 2020. The participants are listed below:

Name	Title	Exit	
		Conference	
James Benedict	Executive Director	X	
FDOE Monitoring			
Team			
Michael Swift	Program Specialist, QAC, FDOE	X	

Records Review

Program, financial and administrative records were reviewed. A complete list is provided in section VII, item C. 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.
 - The day to day operations of DECA is run by a board approved executive director. The executive director is a contracted position that is renewed upon recommendation of the board.
 - DECA does have a Board of Advisors that offer insight into the operation of the CTSO. They meet twice a year during the fall and spring.
 - The executive director is responsible for managing the FDOE grant, submitting completed quarterly deliverables to FDOE, as well as other duties detailed in the executive director's contract.
 - DECA is governed by a Board of Directors that includes the president and chairman; and a Board of Advisors that include local advisors from throughout the state.
 - Although the DECA student registration form does not include a location for students to self-declare a disability, they are made aware of any special accommodations that students may need on a case by case basis from the individual, their local chapter/advisor and DECA.
 - DECA retains records for a minimum five years. All records since the restart of Florida Collegiate DECA in 2015 are maintained by the agency.
- **B.** <u>ACCESS AND EQUITY:</u> refers to compliance with the requirements of federal non-discrimination laws as relating to recruitment, enrollment, participation and completion of programs.
 - The Office of Equal Educational Opportunity (OEEO) is responsible for monitoring and overseeing civil rights compliance obligations. Should you have any questions or concerns, please contact the OEEO at 850-245-0511.

- **C. RECORDS REVIEW:** refers to a review of the records and documents that evidence compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.
 - DECA policies and procedures
 - 2017-18 and 2018-19 quarterly deliverables submitted to FDOE
 - The executive director annual contract (annual budget narrative presented with their grant application)
 - DECA membership forms and conference registration forms
 - Travel expense and reimbursement vouchers
 - Contractual agreements for services provided during conferences
 - Bank statements submitted to FDOE
 - The completed Desk Monitoring Review packet
- **PINANCIAL:** 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.
 - The sole use of the federal grant award money is for the salary of the executive director.
 - Grant funds are tracked with QuickBooks to establish profit and/or loss for the organization.
 The grant is recorded as payments out to the Executive Director, and payments out from
 FDOE.
 - There are efforts to practice economical spending by having an approval process for expenditures that includes Board of Advisors.
 - Financial records provided to FDOE via their quarterly deliverable were reviewed for accuracy and adherence to state and local policy.
 - DECA was paid appropriately for all completed deliverables that were sent to FDOE for verification.

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Required Action Plan – DECA is not required to complete a CTE Corrective Action Plan.

IX. SUMMARY

Once the fieldwork is completed, including receipt of additional requested information when applicable, a preliminary report is forwarded to the provider for review. Comments are accepted and will be considered at the discretion of the FDOE monitoring team lead. Once the final report is approved, it will be forwarded to the agency head along with a copy to the provider's designated contact person. The final report will be posted on the department's website at the following address: http://fldoe.org/academics/career-adult-edu/compliance.

Finally, the division issues a closure letter to the agency head and designated contact person. This letter indicates that all outstanding resolution items have been completed, when applicable, and that no further action is required. This letter will officially end your monitoring process.

On behalf of the department, the monitoring team extends its appreciation to all participants in the DECA onsite monitoring visit. Special thanks is offered to Mr. James Benedict for his participation in this desk monitoring review process.

APPENDIX A

Florida Collegiate DECA, Inc. Career and Technical Student Organization Risk Matrix

Risk Scores Matrix for a Non-College or Non-School District Receiving Career and Technical Education (CTE) Carl D. Perkins Grants

Agency Name: Collegiate DECA

Program type: **CTE**Target Year: **2017-2018**

Monitoring Year: 2019-2020

Metric	Scaling	Point	Points	Weight	Total Metric	
Metric		Value	Assigned		Points	
	7 or More Years	7	7	<u>X 10</u>	70	
Number of Years Since Last	5-6	5				
Monitored	3-4	3				
	0-2	1				
	Upper Quartile	7				
Total Budget for all Perkins	Upper Middle	5	1	<u>X 8</u>	8	
Grants Combined	Lower Middle	3				
	Lower Quartile	1				
	4 or More	7	7	<u>X 8</u>	56	
Number of Perkins Grants	3	5				
Number of Perkins Grants	2	3				
	1	1				
Agency CTE Program Director	Yes	7	0	<u>X 6</u>	0	
Change from Previous Fiscal Year	No	0				
	Upper Quartile	7				
Unexpended Funds from all	Upper Middle	5				
Perkins Grants Combined	Lower Middle	3	7	<u>X 4</u>	28	
reikins Grants Combined	Lower Quartile	1				
	0	0				
AGENCY RISK SCORE:						

Data sources used for calculations: Prior to July 1, 2018