

Quality Assurance and Compliance

Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant

Bay District Schools

September – October, 2023

Final Report

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Florida Department of Education Division of Career and Adult Education

Bay District Schools Pathways to Career Opportunities Grant (PCOG) Quality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Division of Career and Adult Education (Division) within the Florida Department of Education (Department) has several key responsibilities, including leadership, resource allocation, technical assistance, monitoring and evaluation. These duties require the Division to oversee the performance and regulatory compliance of federal and state funding recipients. The Quality Assurance and Compliance (QAC) unit plays a critical role in this process by designing, developing, implementing and evaluating a comprehensive quality assurance system, which includes monitoring. This system aims to ensure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is the Division's duty to regularly monitor the use of workforce education funds and regulatory compliance of providers.

II. AUTHORITY

Pursuant to Section 1008.32, Florida Statutes, Rule 6A-20.046, Florida Administrative Code, the Pathway to Opportunity Grant Request for Proposal and the Uniform Grant Guidance, also referred to as 2 Code of Federal Regulations Part 200, the Department is responsible for monitoring programs run by a sub-grantee or provider of supported activities to ensure adherence to relevant federal and state regulations.

III. QAC CORE MONITORING GUIDE

The Core Monitoring Guide is designed to be utilized by any reviewer who is conducting an onsite or desk monitoring of any program currently administered by the Division. The guide includes a brief overview of each aspect of the monitoring design and the process, as well as objectives that can be used when agencies are monitored or reviewed. You can find the guide on the Division's website at http://fldoe.org/academics/career-adult-edu/compliance. The QAC unit may apply any specific monitoring strategy to any federal or state-funded provider at any time. Some circumstances may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

IV. PROVIDER SELECTION

The Bay District Schools (Bay) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Anne Leonard, Director, Haney Technical College on September 14, 2023. The designated representative for the agency was Ms. Angela Reese, as Ms. Leonard was no longer the Director.

The Division's representative conducting the VDMR was Program Specialist, Michael Swift of the QAC.

V. Bay District Schools

PCOG ENROLLMENT: Zero (0) enrollees

The provider was awarded the following grant(s) for the fiscal year 2019-20:

Finance

FY 2019-20

GrantsGrant NumberGrant AmountUnexpendedPathways to Career030-90310-0D001\$198,930.00*\$3,277.43

Additional information about the provider may be found at the following web address: https://www.bay.k12.fl.us/

VI. MONITORING ACTIVITIES

The monitoring activities include pre- and post-review planning, an entrance and exit conference, records review and interviews with administrators, if necessary.

Onsite Visits

No onsite visits were made during the VDMR process. Site visits are only conducted for the purpose of equipment inventory.

Entrance and Exit Conferences

The entrance conference for Bay was conducted on September 27, 2023. The exit conference was conducted on October 24, 2023. The participants are listed below:

Name	Title	Entrance	Exit
		Conference	Conference
Angela Reese	Director, Haney Technical College	X	X
Division Monitoring			
Team			
Michael Swift	Program Specialist	X	X
Chuck Davis	Program Specialist	X	X

Narrative

In 2019, Bay submitted an application for a grant of \$198,930.00 to establish an Apprenticeship program. By September 2020, Bay's application was approved by the Division and the Office of Apprenticeship at the Department. Bay then collaborated with Eastern Shipbuilding to launch a Welding Technology Apprenticeship program, with Haney Technical College (HTC) as the program sponsor and Eastern Shipbuilding providing on-the-job training (OJT) for the

^{*} Bay submitted an amendment on February 11, 2021, to reduce their total grant award to \$119,370.

apprentices. In the latter part of 2020, HTC developed a program standards curriculum, hired an instructor, and procured equipment for student training.

Regrettably, in May 2021, Eastern Shipbuilding withdrew from the program, prompting HTC to submit an amendment to the state PCOG office to reduce their initial grant award by \$79,560.00. This amount covered the instructor's salary and other expenses projected for the remainder of the program year. The remaining grant funds had already been utilized for equipment purchases and other expenses incurred during the initial phases of establishing the Apprenticeship program. In August 2021, Bay officially notified the PCOG office of the program's cancellation.

During a subsequent monitoring review, the team lead discovered that HTC had acquired welding equipment valued at \$95,000, currently idle and stored on campus. Ms. Reese explained that the equipment was not in use for the existing welding program because it was procured using state funds. This raised concerns about the potential supplanting of federal grant funds with state resources. The monitoring team leader researched viable options for the welding machine and consulted with the Division Bureau Chief of Grants and Compliance. It was determined that the welding equipment could be transferred to the Perkins Advanced Welding program at HTC, which aligns with state funding parameters.

Bay obtained formal permission to facilitate the transfer of the equipment for use in their federally funded welding programs. Mr. Reese provided the requisite documentation, including an updated inventory listing indicating the equipment's new location, asset tag, custodian details, and other relevant information, ensuring compliance with the Department guidelines.

This decision adheres to the rules and administrative code outlined in Section 273.055, Florida Statutes, and Rules 69I-73.005, and 69I73.005, Florida Administrative Code, concerning the disposition of state-owned tangible personal property. Additionally, utilizing the FDOE Green Book ensures that the disposition of equipment aligns with established regulations and guidelines, promoting transparency and accountability in financial practices.

VII. OBSERVATION

- **A.** <u>ADMINISTRATION</u> refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
 - N/A There was no program officially set up, therefore, no administrative insight was observed.
- **B.** <u>DATA AND ASSESSMENT</u> refers to all the data and assessment system components, including test administration, test security, data collection, entry, reporting and procedures. The use of data in program decision-making is also explored and commented.
 - N/A No student data was reported due to the program being canceled.
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to elements contributing to student learning and skill acquisition.
 - No curriculum and instruction were observed during the monitoring review.

- **D.** <u>TECHNOLOGY AND EQUIPMENT</u> refer to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.
 - Bay purchased a single welding machine in anticipation of the program starting. Because the program never began, the item was housed in storage at HTC until the Division granted permission for the item to be used with the current Advanced Welding program at HTC (see narrative for details).
 - Bay has policies and procedures on property management, equipment safety/storage and inventory disposal.
 - Bay utilizes an Inventory Adjustment Sheet that tracks the movement of equipment if it is moved from its initial location. This ensures that the district is always aware of the exact location of a piece of equipment.
 - The Cost Center Manager and Asset Management Liaison act as custodians of all equipment purchased by the district. The HTC Director is the custodian of equipment housed at her location.
- E. <u>EQUAL ACCESS</u> refer to compliance with federal non-discrimination laws' requirements relating to recruitment, enrollment, participation and completion of programs.
 - Bay included the necessary policies required by the General Education Provisions Act, which ensures equal access and participation in programs regardless of sex, race, national origin, color, disability or age.
- **F. <u>RECORDS REVIEW</u>** refers to reviewing the records and documents supporting compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.
 - District policies and procedures for finance and procurement
 - District policies and procedures for property management
 - Inventory records
 - Procurement records
 - Standards of Apprenticeship manual
 - Notification to discontinue the program
 - Employee/employer Apprenticeship contract
 - Welding Technology Apprenticeship program manual
 - Instructional and OJT training manual
- **G. <u>FINANCIAL</u>** 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.
 - Bay's Board Policy Manual ensures the efficient management of grant funds. The following procedural manuals were reviewed:
 - Procurement thresholds

- Methods of procurement
- Contract management
- Cash management
- The district purchasing department works with the PCOG program manager to ensure all expenditures are allowable by law and able to be funded with federal or state dollars. Once a purchase is considered allowable, a "request for purchase order" is sent to the school principal and/or financial designee for approval. The request is then uploaded into the district enterprise resource planning system (TERMS® Business PLUS). The general manager of purchasing will then review the purchase order and select the method of procurement to be used in accordance with district policy.
- Purchase orders are only created and authorized for items previously approved in the Department grant application. Once a purchase has been authorized, the procurement method is determined based on the price of the item(s).
- Upon receipt of grant-purchased goods a payment authorization is created in TERMS® Business PLUS, and the vendor is paid from the appropriate fund. All capitalized equipment purchases will then be "tagged" with a Bay asset identification number.
- **H.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.
 - Bay intended to enter into a formal MOU with Eastern Shipbuilding to create the Welding Technology Apprenticeship program, but the partnership was never initiated.

VIII. RESULTS

Bay District Schools was not found to be out of compliance.

IX. SUMMARY

After completing the monitoring review and receiving any additional information requested, a preliminary report is sent to the provider for their review. The Department monitoring team lead may consider comments at their discretion. Once the final report is approved, it will be sent to the agency head and a copy will be sent to the provider's designated contact person. The final report will also be posted on the Department's website, which you can find at: http://fldoe.org/academics/career-adult-edu/compliance

Once all outstanding corrective action plan items have been completed (when applicable), the Division will issue a closure letter to the agency head and designated contact person. This letter will signify the end of the monitoring process and that no further action is required.

The monitoring team would like to extend their appreciation to all participants in the Bay District Schools monitoring review on behalf of the department. A special thanks is offered to Ms. Angela Reese for her participation and leadership during this process.

Please address inquiries regarding this report to:

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