2013-14
Quality Assurance and Compliance
On-site Monitoring

PROVIDER TRAINING

Ellen McCarron, Director

Quality Assurance and Compliance Section
Division of Career and Adult Education
850-245-9033
Objectives of Conference Call

To provide participants with information regarding grant program monitoring scheduled for Fiscal Year 2013-14
Fiscal Years and Programs Monitored

- Fiscal Years (FY) monitored:
  2011-12, 2012-13 and 2013-14

- Grant Programs to be monitored:
  Adult Education (AE) 
  and/or 
  Carl D. Perkins (CTE)
Topics to be Covered on the Call

- Why do we monitor and what is our way of work?
- How do we select agencies to monitor?
- Agencies selected for monitoring in 2013-14
- Monitoring strategies and areas of focus
- Pre-visit, onsite, and post-visit activities
Topics, continued

• Items to have available for visit

• Post-visit monitoring report

• Examples of findings and concerns found in onsite monitoring

• Team introduction

• General Q & A
Ellen McCarron
Rick Lockenbach
Shahrokh Massoudi
Jakita Jones
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
Five Risk Assessment Factors

- Total amount of agency grant funding (11-12)
- Number of grants (11-12)
- Number of grants with 10% or more of unexpended funds (11-12)
- Previous audit/monitoring findings (10-11, 11-12, and 12-13)
- Change in director within last two fiscal years (11-12, 12-13)
Risk Assessment Process

- How Risk Factors are Applied

<table>
<thead>
<tr>
<th>Risk Factor</th>
<th>Criteria Scale</th>
<th>Value</th>
<th>Risk Factor Weight</th>
<th>Total Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total amount of Agency funding from grants (2011-12)</td>
<td>$2,000,001+</td>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>$700,001- $2 million</td>
<td>6</td>
<td>x 6</td>
<td>=___ (48-24)</td>
</tr>
<tr>
<td></td>
<td>$300,001- $700,000</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>&lt; $300,000</td>
<td>4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Risk Assessment Process

### Change in director example:

<table>
<thead>
<tr>
<th>Risk Factor</th>
<th>Criteria Scale</th>
<th>Value</th>
<th>Risk Factor Weight</th>
<th>Total Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change in program director within the last 2 fiscal years</td>
<td>Yes = 1, No = 0</td>
<td>x 10</td>
<td>x 4</td>
<td>= ___</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(40 - 0)</td>
</tr>
</tbody>
</table>
Risk Assessment Process

• 2011-12 grant data was used for risk calculations

• Monitoring will address grants from 2011-12 through 2013-14

• 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 2013-14

• Risk Assessment scores are gathered by type of agency and ranked

• Agencies are divided into fall/spring groups

• Cyclical monitoring applies to:
  o Community Based Organizations (CBOs)
  o Career Technical Student Organizations (CTSOs)
  o Governmental agencies
Selected Providers 2013-14

Fall Group: September – December

- Brevard County School District (September)
- Madison County School District (October)
- Union County School District (October)
- Bradford County School District (October)
- Broward College (November)
- Palm Beach County School District (December)
Selected Providers 2013-14

Spring Group: January – May, 2014

• Sarasota County School District (CTE and Adult)

• Santa Rosa County School District (CTE and Adult)

• Edison State College (CTE only)

• State College of Florida (CTE only)

• ACE of Florida (Adult only)

• Jefferson County School District (Adult and Administrative)
Monitoring Process

• Pre-visit, on-site and post-visit activities
• Records and data reviews (all phases)
• Direct observation (on-site)
• Interviews (on-site)
Compliance Monitoring Process - continued

- 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
Pre-visit Activities - continued

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

• To be provided by xxxxxxxx

• Organizational chart

• List of administrative staff with duties relevant to these grants; including location and contact numbers

• If available, a map of district/county indicating locations of program sites
Information required -continued

• 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

• Classroom Observations
Onsite Activities - continued

• Records Review (2011-12, 2012-13 and 2013-14):
  Student
  Finance
  Personnel
  Data
  Equipment Inventory (have them ready per EDGAR specifications)
  Perkins Program Improvement Plans – core measures (if applicable) for XXXXXXXX year(s)

• Exit Conference
Have available on the first day…

• Access to records for:
  FY 2011-12
  FY 2012-13
  FY 2013-14

• Policy/handbook for employees

• PLEASE DO NOT MAKE COPIES!
First Day - continued

• Handbooks and materials for students (include student enrollment packet)

• Attendance policies

• Recruitment efforts
First Day - continued

- 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
- Personnel time and effort
First Day - continued

- Local data procedures

- An **inventory of equipment** purchased with the grant funds, **by site**
  - Include building/room locations

- **Maps** to each Adult Education and/or Career and Technical Education class location
First Day - continued

• Alert staff to our visit
  Finance Director
  MIS Director
  Facilities staff
  Other appropriate administrator(s) or principal(s)

• P.S. State ethics rules prohibit accepting food and/or drink unless we pay for them.
Post-visit Activities

• Thank you letters

• 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
Monitoring Report

Areas of Focus, continued:

• Financial
• Records Review
• Technology and Equipment
• Collaboration
• Access and Equity
Findings – examples, continued

Personnel time and effort records findings
Authority/Law: Office of Management and Budget (OMB) Circulars A-21, A-87 and A-122

• Lack of personnel timesheets for program staff working on multiple cost objectives
• Lack of semi-annual certifications for program staff working solely on a single cost objective
Findings – examples, continued

• 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)
  o Lack of classroom safety (gasoline, tools, no partition to shop area)
Findings – examples, continued

• Property inventory findings
  Authority/Law: EDGAR, Section 80.32 Equipment, (d) (1); Florida Administrative Code 69I-72.003
  - Incomplete or lack of inventory for equipment
  - Lack of documentation for location(s) of equipment
  - Lack of documentation for transfer of equipment
  - Improper tagging
  - Lack of procedures for properly disposing certain inventory items
Findings – examples, continued

- **Student records findings**
  - Student records not accessible to compliance team

- **Procurement findings**
  Authority/Law: 34 CFR 80.36(b) – Procurement Standards
  - Lack of policies and procedures for contracting and/or purchasing goods and services
  - Lack of controls for purchase and contract approval
Findings – examples, continued

• 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

  o Lack of timely and accurate reporting of Workforce Development Information System (WDIS) data
  o Over-reporting of instructional hours
Concerns - examples

- 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
Concerns – examples, continued

- No leadership succession plans
- Lack of coordination among MIS/data, program and financial professionals
- Outdated textbooks
- Lack of classroom supplies
- Lack of advisory committee
Concerns – examples, continued

- Outdated policies and procedures
- Lack of attention to off-site location resource needs
- Websites out-of-date
- Physical storage space issues
Total Awarded (2011-12): $98,837,672

Unspent:

- AE: School Districts: $1,586,464
  Colleges and University: $316,514
- CTE: School Districts: $1,367,601
  Colleges and University: $587,475
- CBOs: $152,269
- Government Agencies: $90,207

TOTAL (2011-12): $4,100,530 = (4.1%)
All monitoring reports available on-line:

http://www.fldoe.org/workforce/reports.asp
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)

• Quality Assurance Policies, Procedures, and Protocols
  http://www.fldoe.org/workforce/compliance.asp
Tools and Resources

• 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
Quality Assurance and Compliance Team

Ellen McCarron
Rick Lockenbach
Shahrokh Massoudi
Jakita Jones
Tashi Williams

850-245-9033

Rod Duckworth, Chancellor
Division of Career and Adult Education

Gloria Spradley-Brown, Chief
Bureau of Grants Administration and Compliance
We welcome your comments, feedback, and suggestions

Thank you!

[ Q & A ]