

2013-14
Quality Assurance and Compliance
On-site Monitoring

PROVIDER TRAINING



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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

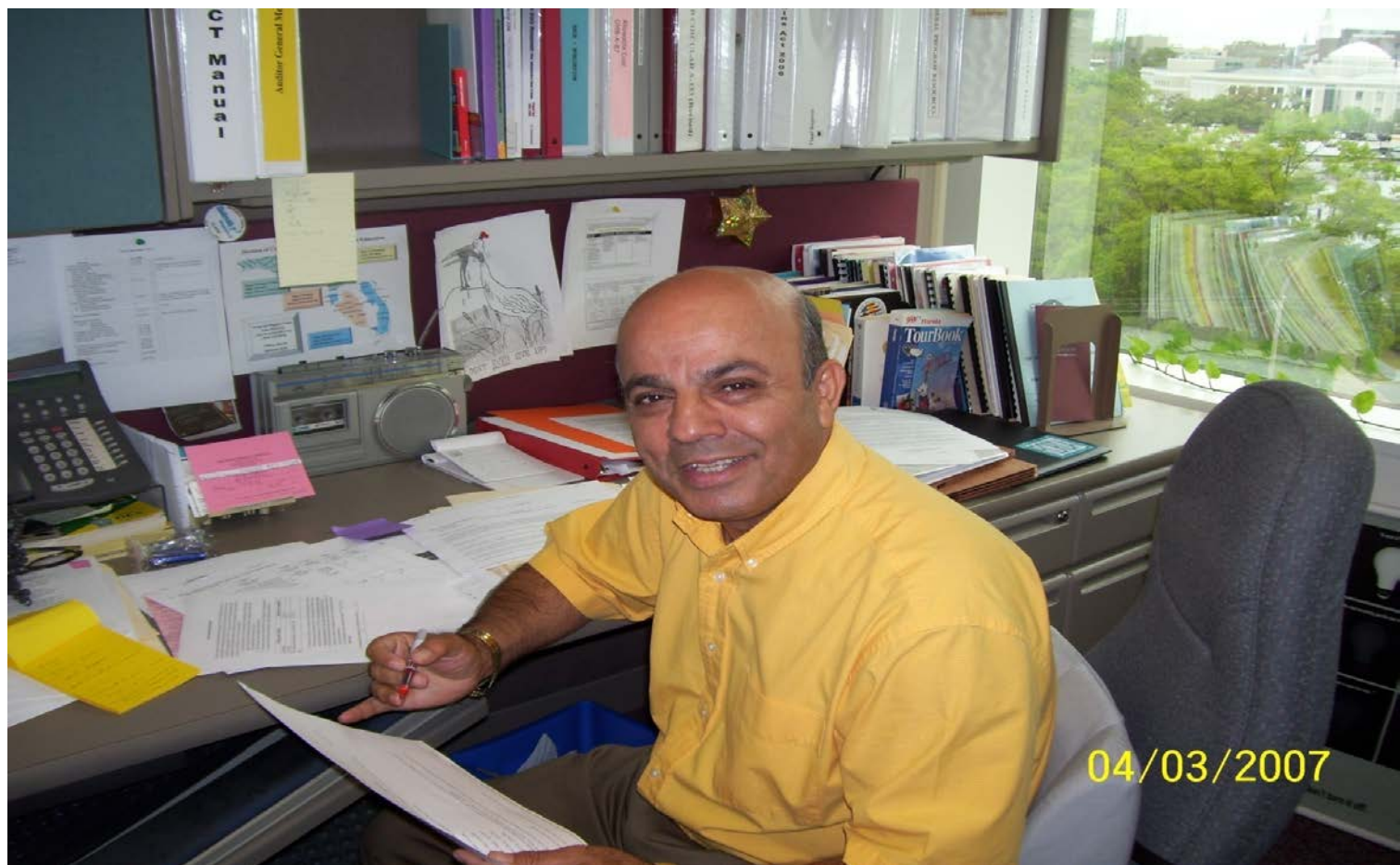
Ellen McCarron



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Jakita Jones



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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

Risk Factor	Criteria Scale	Value	Risk Factor Weight	Total Points
Total amount of Agency funding from grants (2011-12)	\$2,000,001+	8	x 6	= _____ (48-24)
	\$700,001-\$2 million	6		
	\$300,001-\$700,000	5		
	< \$300,000	4		

Risk Assessment Process

Change in director example:

Risk Factor	Criteria Scale	Value	Risk Factor Weight	Total Points
Change in program director within the last 2 fiscal years	Yes = 1 No = 0	x 10	x 4	= _____ (40 - 0)

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:
 - Community Based Organizations (CBOs)
 - Career Technical Student Organizations (CTSOs)
 - 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:
 - Name, address, and zip code
 - Principal/director name and phone number
 - 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 **XXXXXXX** 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

- Exposed wires and extension cords
- Safety rules not posted (e.g., auto, welding)
- 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

Authority/Law: The Family Educational Rights and Privacy Act (FERPA)(34 Code of Federal Regulations (CFR) Part 99.31

- 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

- Lack of timely and accurate reporting of Workforce Development Information System (WDIS) data
- 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%)**

Source: Cash Advance and Reporting of Disbursements System (CARDS)

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)
<http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html>
- 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

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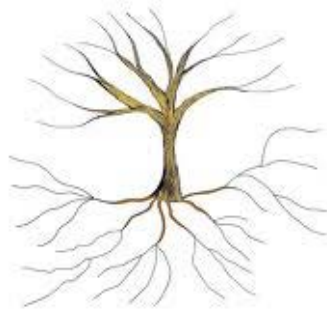
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Rod Duckworth, Chancellor
Division of Career and Adult Education

Gloria Spradley-Brown, Chief
Bureau of Grants Administration and Compliance

We welcome your comments,
feedback, and suggestions

Thank you!



[Q & A]