



# SPRING 2018 Provider Training

Quality Assurance and Compliance Monitoring



FLORIDA DEPARTMENT OF  
**EDUCATION**  
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# Spring 2018 Provider Training Webinar

December 7, 2017

10:00 AM – 12:00 PM (EST)

Webinar registration link:

[www.gotomeeting.com/webinar/homepage](http://www.gotomeeting.com/webinar/homepage)

Call number: 1-888-670-3525

Participant Access Code: 4632608161 then  
press #

## **Please minimize background noise during the webinar.**

- Please keep your phone on mute to listen to the webinar. This eliminates background noise and discussions from disrupting the webinar.
- If your phone does not have a mute button, press \*6

# **FACILITATOR**

Tashi Williams, Compliance Director

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850-245-9033

# Objectives of Webinar

To provide participants with information regarding grant program monitoring scheduled for Fiscal Year 2017-18



# Fiscal Years and Programs Monitored

- Fiscal Years (FY) monitored:
  - 2015-16, 2016-17 and 2017-18
- Grant Programs to be monitored:
  - Adult Education (AE)
  - Carl D. Perkins (CTE)

# Topics to be Covered on the Webinar

- Regulatory requirements
- Why do we monitor?
- What is our way of work?
- Enhancements to the Risk Assessment
- How do we select agencies to monitor?
- Agencies selected for spring 2018 monitoring
- Monitoring strategies and areas of focus
- Pre-visit, on-site, and post-visit
- Items to have available for review
- Program of Study Requirement
- Post-visit monitoring report
- Examples of findings and concerns found during monitoring review
- General Q & A

# Regulatory Requirements

- Federal and state requirements
  - 2 C.F.R. Part 200, Uniform Grant Guidance (link below)  
<http://www.ecfr.gov/cgi-bin/text-idx?SID=704835d27377ef5213a51c149de40cab&node=2:1.1.2.2.1&rgn=div5>
- 2 C.F.R. Part 200.61 and 200.62 (Internal Controls)



# Policies and Procedures that Must be in Writing

- Conflict of Interest
- Fraud
- Travel
- Inventory/equipment
- Procurement
- Allowability
- Gratuities
- Cash Management

## Why Do We Monitor?

- Opportunity for needed corrections
- Continuous improvement and positive changes
- Recognition

# What is Our Way of Work?

Implementation of a risk-based system that is:

- Based on project risk;
- Collaborative in nature;
- Recognizes positive practices;
- Identifies findings and concerns related to program quality and compliance; and
- Supports systemic and continuous program improvement.

## Risk Assessment Factors 2017-18

### Risk Matrix – Operational Risk Factors (Metrics)

- Last monitoring review\*
- Number of grants
- Total amount of agency funding
- Number of grant funds remaining
- Perkins Program Improvement Plan (PIP)
- Audit/monitoring findings
- Change in director

\* Denotes new data element as of 2017-2018

## 2017-18 Risk Assessment Process

- Risk score divided into quartiles
- Balanced weight between data elements

Upper Quartile/Higher	7
Upper Middle	5
Lower Middle	3
Lower Quartile	1
Zero	0

# 2017-18 Risk Assessment Process Continued

Calculation of the Risk Score:

- Point Value Assigned X Weight = Total Metric Point
- Sum of all Metric Points = Agency Risk Score

**(Sample) Risk Matrix for Colleges, Districts, Non-College/Non-District Receiving Carl D. Perkins Grants**

**Agency Name:** Sunshine State College

**Target Year: 2015-2016 (Monitoring Year 2017-2018)**

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)
Number of Years Since the Agency Was Last Monitored	7 or more years	7	5	X 10	50
	5-6 Years	5			
	3-4 Years	3			
	0-2 Years	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	5	X 8	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4+	7	7	X 8	56
	3	5			
	2	3			
	1	1			
3-year Perkins Improvement Plan (PIP) Index	7.50 – 10.00	7	0	X 8	0
	5.00 – 7.49	5			
	2.50 – 4.99	3			
	0<index<2.50	1			
	0	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	X 6	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	1	X 4	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
# OAG Audit Findings	Upper Quartile	7	3	X 4	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					204

# Risk Assessment Process

- 2015-16 grant data was used for risk calculations
- Monitoring will address grants from 2015-16 through 2017-18
- Additional programs in the geographical area may also be reviewed/monitored



## Provider Selection 2017-18

- Agencies with the highest risk matrix may be targeted for monitoring
- Monitor both CTE and AE
- Various monitoring strategies are implemented

# Quality Assurance

## Spring 2018 targeted providers for on-site monitoring:

- Broward County School District
- Citrus County School District
- Charlotte County School District
- Gulf County School District
- Highlands County School District
- Marion County School District
- Santa Fe College
- Seminole State College
- Sumter County School District
- St. Johns River State College
- Volusia County School District

# Monitoring Process

- Pre-visit, on-site and post-visit activities
- Records and data reviews (all phases)
- Interviews
  - Phone calls, emails
  - Referrals
- Resolution Plans:
  - Corrective Action Plans (Findings)
  - Action Plan (Concerns)

## Pre-visit Activities

- Notification (personal and correspondence)
- Webinar training for providers
- Team leader coordination
- Coordination with DOE team leader:
  - Confirmation of agency contact (preferably one designee per agency for AE and CTE programs)
  - Coordination and communication with DOE team leader
  - Develop site visit schedule for inventory (onsite)
  - Submit Program of Study Materials as requested

## Information Required

- Organizational chart
- List of administrative staff with duties relevant to these grants; including location and contact numbers
- If available, a map of the district/college indicating locations of program sites
- List of all AE and/or CTE program sites including:
  - Name, address, and zip code
  - Principal/Dean/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
  - Staff/Faculty if needed
- Records Review (2015-16, 2016-17 and 2017-18):
  - Student
  - Finance
  - Personnel
  - Data

## On-site Activities - continued

- Equipment Inventory
  - According to EDGAR specifications – (2015-16 through 2017-18 grants)
  - According to the Uniform Grant Guidance (UGG) –  
The final rule implementing the UGG was published in the Federal Register on December 19, 2014, and became effective for new and continuation awards issued on or after December 26, 2014.
- Perkins Program Improvement Plans (if applicable)
- Programs of Study conference call
- Exit conference

## Have Available on the First Day (on-site)...

- Access to records for:
  - FY 2015-16
  - FY 2016-17
  - FY 2017-18
- Policy/handbook for employees
- **PLEASE DO NOT MAKE COPIES!**
- Handbooks and materials for students (include student enrollment packet)
- Attendance policies
- Recruitment efforts
- 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
- Financial policies and procedures including those related to purchasing and procurement of contractual services, equipment and supplies
- Travel and purchasing records
- Local data procedures
- An **inventory of equipment** purchased with the grant funds, **by site**
- **Maps** to each AE and/or CTE location
- Staff to alert for our visit:
  - Finance Director
  - MIS Director/Institutional Research
  - Staff involved with the 2015-16 Program of Study
  - Other appropriate administrator(s) or principal(s)
- **P.S. We pay for our own food and drink!**

# Inventory Guidelines

The following elements are required on the inventory of all equipment purchased.

***2 C.F.R. 200, Uniform Grant Guidance, 200.313 Equipment: Property records must be maintained that include:***

- Description of Property
- Serial Number/ID Number
- The source of the funding
- Title Holder
- Acquisition Date
- Cost of Property
- Percentage of Federal Participation
- Location of Property
- Use and Condition of Property
- Sale Price
- Date of Disposal

# Sample Property Inventory List

SUNSHINE STATE COLLEGE Property Inventory List									
Serial Number/ ID Number	Description of Property	Source of Funding	Title Holder	Acquisition Date	Cost of Property	Sale Price	Manufacturer	Location of Property/ Room	Date of Disposal
F415661D9HD4	COMPUTER IMAC 27"	ADULT BASIC	JOHN STEWART	05/30/15	\$4,534.21	N/A	APPLE	456	N/A
F45892S3589	6 BURNER GAS RANGE	CARL PERKINS	PAMELA BROWN	08/05/14	\$5,423.54	\$4,562.01	US RANGE GARLAND	125	2/15/2016
S6D3356V23	WARMING CABINET	CARL PERKINS	MARIE OLIVER	05/18/15	\$245.21	N/A	VULCAN	124	N/A
FG541S226	STORAGE CABINET	ADULT BASIC	STEPHEN GRAY	06/24/15	\$4,587.23	\$1,542.25	GMI	163	N/A
F5G65623SD	DRONE HELOCOPTER	ADULT BASIC	LYLE GOLDEN	06/08/16	\$451.24	N/A	DJI	214	N/A
465.54L56	COMPUTER IMAC 27"	CARL PERKINS	JAMES HARRIS	08/07/13	\$5,685.51	N/A	APPLE	321	5/30/2015
298556	TABLE W/ WHEELS	CARL PERKINS	MICHAEL JONES	10/15/13	\$4,876.55	\$3,453.25	EAGLE GROUP	325	12/7/2015
5545600	WORKING TABLE	ADULT BASIC	ELIZABETH REYS	12/07/15	\$8,756.25	N/A	EAGLE GROUP	323	N/A
NONE	PRINTER	ADULT BASIC	JASON BORNE	03/10/15	\$5,543.14	N/A	HP	154	N/A
UHKJ554521	MOBILE LAB CHART	CARL PERKINS	VALERIE HODGE	09/21/15	\$5,463.24	N/A	SPECTRUM	245	6/22/2016
NONE	COMPUTER IMAC 27"	ADULT BASIC	MELINDA JONES	11/24/15	\$5,513.15	N/A	APPLE	186	N/A
87456.45.456	DEEP FRYER	CARL PERKINS	HAROLD WHITE	09/24/13	\$2,685.00	\$745.25	PITCO	152	4/24/2016



# Program of Study

Bruce Harrington

## Program of Study Conference Call

- Program of Study(POS) conference call conducted first day of visit
- Conducted by staff of the Federal and State Initiatives (FSI) section of the DCAE
- Prior to call, all relevant agencies will complete the Program of Study section of the protocol and return to your team leader, based on 2015-16 primary POS
- Email sent prior to visit outlining materials needed and suggested stakeholders to be present on call

# Program of Study Conference Call

## Background Materials for Call

- Copy of POS Form outlining pathway for students to move from secondary to postsecondary and into the workforce from the 2015-16 Perkins RFA
- Copy of Local Articulation Agreements for this POS
- Responses to POS narrative section of monitoring protocol
- Other materials as requested to validate POS

# Program of Study Conference Call

## Purpose of Call

- Review aspects of the agency's primary 2015-16 POS from that year to present
- Address questions or need for further information based on submitted responses to POS narrative section of monitoring protocol
- By discussing this particular POS, also hope to gain an understanding of the processes in place at your agency for identification, development, implementation and review of your POS

# FSI Program of Study Team Members

Bruce Harrington, Director  
Federal and State Initiatives (FSI)  
850-245-0949

Cathy Hammond  
Heather Conley





# Post-visit Activities

Tashi Williams

## Post-visit Activities

- Thank you letters & evaluation survey
- Monitoring Report
  - Preliminary Draft – sent to director for feedback
  - Final Report - sent to agency head and director
- Resolution activities
  - Corrective Action Plan – for Findings
  - Action Plan – for Concerns
  - Follow-up communication
- Closure letter

# Monitoring Report

## Areas of Focus:

- Administration
- Data
- Curriculum and Instruction
- Financial
- Records Review
- Programs of Study
- Technology and Equipment
- Collaboration

# Common Findings Discovered in Onsite Monitoring Visits to Agencies

- Lack of Advisory Committee in CTE programs
  - Absence of statements
  - Lack of advisory committee implementation and involvement
  - Lack of business and industry relationships with programs and parental involvement
- 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 ramps for wheelchair accessibility

## Common Findings, continued

- Property inventory findings

Authority/Law: 2 C.F.R. 200, Uniform Grant Guidance, 200.313

Equipment and EDGAR, Section 80.32 Equipment, (d) (1)

- Incomplete or lack of inventory for equipment
- Property not properly tagged
- Lack of procedures for properly disposing certain inventory items

- Procurement findings

Authority/Law: 34 CFR 80.36(b) – Procurement Standards

- Lack of policies and procedures for contracting and/or purchasing goods and services
- Timesheets were not signed by the employee or the supervisor
- Executive director approved his/her own travel authorization forms
- Checks exceeding \$10,000 and signed only by the executive director

## Common Findings, continued

- Inadequate data quality/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
- Student records findings  
Authority/Law: The Family Educational Rights and Privacy Act (FERPA)(34 Code of Federal Regulations (CFR) Part 99.31
  - Student records were not accessible to compliance team

## Common Concerns

- Last minute spending...students must benefit
- No staff development plans
- No leadership succession plans
- Lack of coordination among MIS/data, program and financial professionals
- Outdated policies and procedures

## Common Concerns - continued

- Lack of attention to off-site location resource needs
- Websites out-of-date



# Common Best Practices Discovered in Onsite Monitoring Visits to Agencies

- Innovative uses of technology
- Continued collaboration with business and industry

# Monitoring Reports

- Monitoring reports are available online:

<http://fldoe.org/academics/career-adult-edu/compliance>

## Tools and Resources

- Carl D. Perkins Career and Technical Education Improvement Act of 2006  
[http://fldoe.org/core/fileparse.php/3/urlt/perkins\\_iv\\_text.pdf](http://fldoe.org/core/fileparse.php/3/urlt/perkins_iv_text.pdf)
- Workforce Innovation and Opportunity Act of 2014  
<http://www.doleta.gov/WIOA/>
- Education Department General Administrative Requirements (EDGAR)  
<http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html>

## Tools and Resources - continued

- Federal Uniform Grant Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards)

<https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>

- Florida Department of Education, Quality Assurance and Compliance

<http://fldoe.org/academics/career-adult-edu/compliance>

- Florida Department of Education “Green Book”

<http://www.fldoe.org/finance/contracts-grants-procurement/grants-management>

# Quality Assurance and Compliance Team

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## [ Q & A ]

We welcome your comments,  
feedback, and suggestions  
Thank you!





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