

# The 2020-21 Monitoring and Compliance Tool

Monit	toring and (	Compliance T	ool	
Subrecipient's Agency Name:				
Type of Monitoring:				
Date(s) of Monitoring:				
21st CCLC Monitoring Staff Name	e and Title:			
Main Contact Name:		Phone:		
Mailing Address:		Email:		
Date of Entrance Interview:				
Date of Exit Interview:				
Project Name	Cohort Number	Project Number (2018-2019)	Project Number (2019-2020)	
Center(s) Visited				
Location(s)		Date Visited		
			_	

# Florida Department of Education 21st Century Community Learning Centers

# **Table of Contents**

C01 - Prior Monitoring Activities	3
C02 - Program Income	3
C03 - Secular and Non-ideological	4
C04 - E-Verify	4
C05 - Prohibition of Text Messaging and Emailing While Driving	5
C06 - Independent Evaluator	5
C07 - Students with Special Needs	6
C08 - Equitable Services	6
C09 - Student Attendance	7
C10 - Required Deliverables	8
C11 - Background Screening and Training of all Staff and Volunteers	8
C12 - Student Safety	9
C13 - Academic Focus and Rigor	10
C14 - Collaboration with the regular school day	10
C15 - Target Population, Recruitment and Retention	11
C16 – Sustainability	12
C17 – Program Schedule	12
C18 – Student to Adult Ratios	13
C19 – Policies & Procedures	13
C20 – Allowable Expenses	14
C21 – Procurement Rules and Regulation	15
C22 – Conflict of Interest	16
C23 – Financial Management	16
C24 – Time and Effort	17
C25 – Travel	18
C26 – Property Management	19
C27 – Records Retention	20
C28 – Supplement, Not Supplant	20
C29 – Subgrant	21
C30 – Written Agreement	22
C31 – Grants Fiscal Management Training	22

CO1 - Prior Monitoring Activities					
Program Requirement: The subrecipient agrees to fully cooperate w and/or authorized representatives. The subremonitoring, audit, Corrective Action Plan (CA)	ecipient	must me	et the required additiona rement Plans.		
		M	CU Review		
Additional obligations:					
Evidence of Program Implementation:  Policies and Procedures  Observation		Correcti	ed Application ve Action Plan		Prior Reports Other
		IV	ICU Notes		
Monitoring Process  Monitoring Outcomes					
Performance Level			Citation(s)	(1166)	2.05D 200 224/- \/2.2\
Concerns Identified			Uniform Grant Guidano	ce (UGG)	: 2 CFR 200.331(a)(2-3)
Concerns Identified					
How the subrecipient may resolve the issue	:				
CO1 Subrecipient Response:					
CO2 - Program Income					
Program Requirement: The intent of the 21 <sup>st</sup> CCLC program is to estatheir families. The FDOE does not allow the coincome and is not allowable. Programs may refer to the content of the c	harging	of fees. A	All income resulting from	the colle	ction of fees is deemed program
		М	CU Review		
Additional obligations:					
Evidence of Program Implementation:  Policies and Procedures  Observation			Ledger Handbook ICU Notes		Staff Interviews Other
Monitoring Process		IV	ico Notes		
Monitoring Process					
Monitoring Results					
Performance Level			Citation(s)		
☑ Choose an item.			2020-21 RFP Statewide:	2.1; 202	0-21 RFA Statewide: 4.3; FDOE
Concerns Identified			Green Book (2015): F1-F	-3	
How the subrecipient may resolve the issue	:				
CO2 Subracipient Response:					

[Agency Name] 3 | Page

The 2020-21 Monitoring and Compliance Tool				
CO3 - Secular and Non-ideological				
Program Requirement: Services and benefits provided must be secular, new expended to support religious practices, such as rel such practices, but not as part of the 21 <sup>st</sup> CCLC progrequirements to ensure that funds are not used to see the secular of the secular of the secular provided in the s	ligious insti gram. FBOs	ruction, worship or pray should comply with ge	er. Faith-b	ased organizations (FBOs) may offer
	M	CU Review		
Additional obligations:				
Evidence of Program Implementation:  Policies and Procedures  Observation	General Program	Ledger Handbook		Staff Interviews Other
		ICU Notes	_	<del></del>
Monitoring Process				
Monitoring Results				
Performance Level  ☑ Choose an item.		Citation(s) FDOE Green Book (201 Subrecipient Assurance		l Assurances, 2020-21 21 <sup>st</sup> CCLC
Concerns Identified				
How the subrecipient may resolve the issue:				
CO3 Subrecipient Response:				
C04 - E-Verify				
Program Requirement: The subrecipient must utilize the E-Verify system as compares information from an employee's Form I-9 Homeland Security and Social Security Administration	9, Employm on records	nent Eligibility Verification to confirm employmen	on, to data	from U.S. Department of
	M	CU Review		
Additional obligations:				
Evidence of Program Implementation:				
	N	ICU Notes		
Monitoring Process  Monitoring Results				
Performance Level  ☑ Choose an item.		Citation(s) State Executive Order: 21 RFA Statewide: 4.1:	•	20-21 RFP Statewide: 2.10; 2020-
Concerns Identified				
How the subrecipient may resolve the issue:				

[Agency Name] **4 |** Page

The 2020-21 Monitoring and Compliance Tool								
CO4 Subrecipient Response:	Subrecipient Response:							
CO5 - Prohibition of Text Messaging and Emailing While Dr	iving							
vehicle, or while driving their own privately-owned vehicle du electronic equipment to text message or email while driving.	hibited from text messaging while driving a government-owned ring official grant business, or from using government supplied stive Order 13513, "Federal Leadership on Reducing Text Messaging							
M	CU Review							
Additional obligations:								
Evidence of Program Implementation:  ☐ Policies and Procedures ☐ Personn ☐ Other	el Handbook							
N	ICU Notes							
Monitoring Process  Monitoring Results								
Performance Level  Choose an item.	Citation(s) 2020-21 21 <sup>st</sup> CCLC Subrecipient Assurances							
Concerns Identified	2020-21 21 CCLC Subjectifient Assurances							
How the subrecipient may resolve the issue:								
CO5 Subrecipient Response:								
C06 - Independent Evaluator								
agency or organization with no vested interest in the operation subrecipient's partners, family members of the subrecipients,	or for the program. The 21 <sup>st</sup> CCLC evaluator must be an individual, ons of the 21 <sup>st</sup> CCLC program. Such individuals as grant writer(s), the participants, individuals/agencies that provide trainings to 21 <sup>st</sup> CCLC mance and/or wages are dependent on the 21 <sup>st</sup> CCLC program cannot							
	ion of the program including the cost of the purchase of assessment ivities, recording and maintenance of data, report writing and any ram.							
M	CU Review							
Additional obligations:								
Evidence of Program Implementation:  Approved Application  Signed Contract with Evaluator  Observation  Other  Evaluator								
Monitoring Process	ICU Notes							
111011110111116 1 1 0 0 0 0 3								

[Agency Name] 5 | Page

Monitoring Results					
Performance Level  ☑ Choose an item.	Citation(s) 2020-21 RFP Statewide: 2.16; 2020-21 RFA Statewide: 2.12				
Concerns Identified					
How the subrecipient may resolve the issue:					
C06 Subrecipient Response:					
CO7 - Students with Special Needs					
needs include those who may be identified as English languag developmental, psychological and sensory or learning disability communication, self-care, attention or behavior, and may requot be excluded from the 21st CCLC program, regardless of the	y, that results in significant difficulties in areas such as uire more structured supervision. Students with special needs shall level or severity of need, provided that they can be safely tive narrative of the process the subrecipients will use to ensure				
	CU Review				
Additional obligations:					
Evidence of Program Implementation:  ☐ Policies and Procedures ☐ Approve ☐ Observation ☐ Other	d Application Program Handbook				
N	ICU Notes				
Monitoring Process					
Monitoring Results					
Performance Level  ☑ Choose an item.	Citation(s) 2020-21 RFP Statewide: 2.19; 2019-20 RFA Statewide: 2.5, and 4.21; 2020-21 21 <sup>st</sup> CCLC Subrecipient Assurances				
Concerns Identified	2020 2121 COLO GUDI CO. IPICINE / ISSUI GINCOS				
How the subrecipient may resolve the issue:					
CO7 Subrecipient Response:					
CO8 - Equitable Services					
(EDGAR) require that $21^{\text{st}}$ CCLC-funded programs provide equeducation personnel.	the Education Department General Administrative Regulations table services to eligible private school students, teachers and other				
	CU Review				
Additional obligations:					
• •	d Application				

[Agency Name] 6 | Page

, i				
	M	ICU Notes		
Monitoring Process				
Monitoring Results				
Performance Level		Citation(s)		
				220-21 RFA Statewide: 2.6, and 4.22;
		2019-20 21st CCLC Subre	cipient <i>i</i>	Assurances
Concerns Identified				
How the subrecipient may resolve the issue:	:			
CO8 Subrecipient Response:				
C09 - Student Attendance				
Program Requirement: 21st CCLC programs are not drop-in programs full participation in all the daily activities and for each student served. All programs must his student individually.  Programs must record and maintain daily stuccle Program Office. All 21st CCLC programs CCLC Administrative Team.  Deliverables Subrecipients that are awarded the Statewide	long term engag ave a formal sign dent attendance must report atter	ement in the program. At a rin and out process that rin a manner consistent with and ance using the EZ Reports.	tendance ecords the sith the section that the section tha	the arrival and dismissal time of each the arrival and dismissal time of each guidelines provided by the FDOE 21st ication provided by Florida's 21st
Deliverable(s) in approvable form by the date		• •		
	IVIO	CU Review		
Additional obligations:				
Evidence of Program Implementation:  Policies and Procedures Deliverable(s) Staff Interviews Other Other	☐ Site Prof ☐ Correspo	ed Application File Worksheets Ondence		Observation EZ Reports Student Sign-in/out Sheets
Monitoring Process				
Monitoring Results				
Performance Level  ☑ Choose an item.		Citation(s) 2020-21 RFP Statewide: Green Book (2015): C1	3.6; 202	20-21 RFA Statewide: 2.3; FDOE
Concerns Identified				
How the subrecipient may resolve the issue:	:			
C09 Subrecipient Response:				

[Agency Name] 7 | Page

## C10 - Required Deliverables

### **Program Requirement:**

All funded subrecipients are required to submit evidence of completion of activities that directly relate to the goals and objectives of the program, commonly referred to as deliverables. A complete list of required program deliverables can be found in Section 7. The deliverables include an array of reports, evaluation data, daily attendance or activity reporting, and other documentation as appropriate for the 21<sup>st</sup> CCLC program. Daily attendance reporting is required every month. The deliverables are due on the 15th day of each month. Deliverables will be reviewed and monitored to determine compliance with the program requirements.

The timeliness, quality and accuracy of the submission of deliverable documentation will be considered in determining subrecipient risk and performance.

risk and performance.				
	IV	1CU Review		
Additional obligations:				
Evidence of Program Implementation:				
	ľ	MCU Notes		
<b>Monitoring Process</b>				
Monitoring Results				
Performance Level		Citation(s)		
☑ Choose an item.		2020-21 RFP Statewide: 2	2.4; 2020	-21 RFA Statewide: 4.6
Concerns Identified				
How the subrecipient may resolve the issue	e: 			
C10 Subrecipient Response:				
C11 - Background Screening and Training	of all Staff and V	/olunteers		
Program Requirement: All 21 <sup>st</sup> CCLC staff and contractors must be of Volunteers that assist more than 10 hours ps. 39, 402 and 409, F.S.			_	
	IV	1CU Review		
Additional obligations:				
Evidence of Program Implementation:				
Approved Application	_	mesheets		Deliverable(s)
Correspondence		and Procedure		Staff Interviews
☐ Staff List	☐ Letter f	rom HR		Level II Background
Other		MCII Notes		Checks
Monitoring Process	<u> </u>	MCU Notes		
Monitoring Results				
Performance Level		Citation(s)	10.000	0.24 PEA CLUL 11 2.42
<ul><li>Choose an item.</li><li>Concerns Identified</li></ul>		2020-21 RFP Statewide: 3	3.10; 202	U-21 KFA Statewide: 2.10
Concerns Identified				

[Agency Name] 8 | Page

How	How the subrecipient may resolve the issue:						
	, , , , , , , , , , , , , , , , , , , ,						
C11	Subrecipient Response:						
C12 -	Student Safety						
Subre transp they o	am Requirement: cipients must ensure that all proce cortation, field trips, food, medical conform to applicable local and sta nally identifiable information and o	and other te standar	r emergency rds. Subrecij	y procedures, etc. pients must take i	are clearly liste	ed and widely disseminated, and that	
facilit must recreate resources and 21st C face-t per sire. Childen The 2 defined receive.	rding to ESEA Sec. 4204(b)(2)(A)(i), and with the ast available and accessible have sufficient resources to provide ational area and study area. The center must afford stude and First Aid Certification  CLC programs shall maintain at least co-face component. In order to mente.  Care Licensing  1st CCLC program centers must contend to the contend of	e all proper nter must nts a safe st one state et this re- nply with sements for e.	ents and the osed and received and healthy and healthy ff member of quirement, s. 402.26-40 or licensing.	eir adult family m quired activities, s fficient space and y environment. on site at all times programs should 02.319, F.S. This Fl Subrecipients mu	embers as the souch as a computation facilities to main as with CPR and Rensure that at a lorida Statute, the st submit a validativers. Only the	uter lab, library, eating area, safe intain and secure equipment and First Aid certification that includes the least two staff members are certified ogether with Rule 65C-22.008, F.A.C.,	
	ccuracy of the information and doc			<u>~</u>	•	——————————————————————————————————————	
			M	CU Review			
Addit	ional obligations:						
Evide	nce of Program Implementation: Approved Application Staff List Other		Delivera Letter fr	• •		Policy and Procedure CPR and First Aid Certification	
			N	1CU Notes			
	toring Process toring Results						
Perf ⊠	ormance Level Choose an item.			Citation(s) 2020-21 RFP Sta 21 <sup>st</sup> CCLC Subred		020-21 RFA Statewide: 2.11; 2019-20 ces	
Conce	erns Identified						
How	the subrecipient may resolve the i	ssue:					

	ic 2020 21 Worldoning and complian					
Concer	Concerns Identified					
How th	e subrecipient may resolve the issu	e:				
C12	Subrecipient Response:					
C13 - A	Academic Focus and Rigor					
All 21st of the	m Requirement:  CCLC programs are required to oper participating students. Programs must ew skills, develop creative ways to a	st provid	de a breadt	th of activities and services	that off	•
All academic services must be aligned with the curriculum in the core subject areas of each of the schools attended by the participating students. Lesson and/or unit plans for academic enrichment activities must be required as part of the deliverable(s). Each student in the program must be afforded of the full breadth of programming each week as described in the awarded application. The programs or activities must be based on research that shows that the students will meet challenging State academic standards.						
	vork assistance and tutoring should be homework to students, an alternat		•		_	
certific implem	nic enrichment must be supervised be ate or a temporary certificate (see St ented to improve the student's perf ework assistance and tutoring.	BE Rule	6A-4.001).	Academic enrichment activ	vities ar	e those that are designed and
	_		M	CU Review		
Additio	onal obligations:					
Eviden	ce of Program Implementation:					
	Approved Application		Delivera	ble(s)		PBL Plan
	Florida Standard		Lesson F	Plans		Staff Interviews
	Select Transactions		Program	n Schedule		Other
			IV	1CU Notes		
Monito	oring Process					
Monito	oring Results					
Perfo	rmance Level			Citation(s)		
<ul> <li>☑ Choose an item.</li> <li>☑ 2020-21 RFP Statewide: 2.4, 3.9, and 7; 2020-21 RFA Statewide: 2.1 and 2.2; 2020-21 21st CCLC Subrecipient Assurances</li> </ul>						
Concer	ns Identified					
How th	e subrecipient may resolve the issu	e:				
C13	Subrecipient Response:					
C14 - (	Collaboration with the regular scho	ol day				
Progra	m Requirement:					

[Agency Name] 10 | Page

21st CCLC programs must be designed and carried out in active collaboration with the regular school day attended by the students participating in the 21st CCLC activities. As such, the program plan and activities must be designed in coordination with the regular schools attended by the students and implemented to support what the students are learning during the regular school day. All academic services must be aligned with the curriculum in the core subject areas of each of the schools attended by the participating students. **MCU Review** Additional obligations: **Evidence of Program Implementation:** Collaboration Log **Approved Application** Deliverable(s) Correspondence Meeting Agendas Other **MCU Notes Monitoring Process Monitoring Results Performance Level** Citation(s) 2020-21 RFP Statewide: 2.4, and 7; 2020-21 RFA Statewide: 2.8 **Concerns Identified** How the subrecipient may resolve the issue: C14 **Subrecipient Response:** C15 - Target Population, Recruitment and Retention **Program Requirement:** Students enrolled in 21st CCLC programs must attend the target school(s). Students must be recruited and provided continuous services designed to encourage full participation in all the daily activities and long term engagement in the program. 21st CCLC programs are not drop-in programs. Students are expected to participate in 21st CCLC programs on a regular basis. Positive outcomes for students are strongly linked to a higher number of days of participation in a quality program. Programs must implement strategies to maximize the number of participation days for each student. Regularly participating students are those students that participate in the 21st CCLC program for 30 days or more. **MCU Review** Additional obligations: **Evidence of Program Implementation: Approved Application** Policies and Procedures Deliverable(s) Observation Correspondence Site Profile Worksheets Meeting Agendas  $\Box$ Attendance Data Other **MCU Notes Monitoring Process Monitoring Results Performance Level** Citation(s) 2020-21 RFP Statewide: 3.4; 2020-21 RFA Statewide: 1.5 Concerns Identified

[Agency Name] 11 | Page

The 2020-21 Monitoring and Compile	ince I ooi				
How the subrecipient may resolve the iss	ue:				
C15 Subrecipient Response:					
C16 – Sustainability					
Program Requirement: In accordance with ESEA Sec. 4204 (b)(2)(I will continue after funding ends. Programs collaborating with other school and common lin order to ensure broad-based communit establish a local 21 <sup>st</sup> CCLC Advisory Board. program needs and/or concerns, program	s should planting should property, school The focu	olan to sustain thei encies to build sup and student involv is of the advisory b	r 21 <sup>st</sup> CCLC program l port for resources ne vement and support, oard meetings should	by bu eded all 21 d incli	ilding partnerships and to sustain the program  st CCLC programs are required to ude at a minimum current or future
implement the sustainability plan.					
		MCU Revi	ew		
Additional obligations:					
Evidence of Program Implementation:  Approved Application Deliverable(s) Sustainability F			Sustainability Plan		
☐ Correspondence		Meeting Agenda	as [		Other
		MCU Not	es		
Monitoring Process  Monitoring Results					
Performance Level  Choose an item.		Citatio	• •	2 and	d 7; 2020-21 RFA Statewide: 2.14
Concerns Identified		2020-2	.1 MF Statewide. 3.1	J, aii	u 7, 2020-21 NI A Statewide. 2.14
How the subrecipient may resolve the iss	ue:				
, , , , , , , , , , , , , , , , , , , ,					
C16 Subrecipient Response:					
C17 – Program Schedule					
Program Requirement: The subrecipient's program schedule must support the objectives of the 21st CCLC progenichment and personal enrichment active.	ogram. 21	L <sup>st</sup> CCLC programs i	must offer an array o	f activ	vities including academic
		MCU Revi	ew		
Additional obligations:					
Evidence of Program Implementation:  Approved Application Site Profile Worksheets EZ Reports Other		Policies and Pro Correspondence Inventory	e [	] ] ]	Observation Lesson Plans Attendance Documentation
		MCU Not	es		
<b>Monitoring Process</b>					
Monitoring Results					

**12** | Page [Agency Name]

Perfo	rmance Level			Citation(s)			
	Choose an item.			2020-21 RFP Sta	tewide; 2020-21	RFA Statewide: 2.1 and 2.2	
Concer	ns Identified						
How th	e subrecipient may resolve the	issue:					
C17	Subrecipient Response:						
C18 _ '	Student to Adult Ratios						
_	m Requirement:	student to	adult ratios	that are no more	a than 10 student	ts to one instructional staff person	
	or all academic enrichment. Rat						
	be appropriate to support the e		_				
					· ·	ubrecipients must meet the student	
	t ratios stated in their approved		,			•	
	· ·		M	CU Review			
Additio	onal obligations:						
Eviden	ce of Program Implementation:						
	Approved Application		Observa	tion		Site Profile Worksheets	
	Payroll Register		EZ Repo	rts		Attendance	
	Other		·			Documentation	
			N	1CU Notes			
Monito	oring Process						
	<b>G</b>						
Monito	oring Results						
Perfo	rmance Level			Citation(s)			
	Choose an item.			2020-21 RFP Statewide: 3.9 and 3.10; 2020-21 RFA Statewide: 2.10			
Concer	ns Identified						
How th	e subrecipient may resolve the	issue:					
C18	Subrecipient Response:						
C19 – I	Policies & Procedures						
_	m Requirement:				. ,	6.11	
	m Guidance requires that progra		~		· •	_	
_	ipients should also have the lead	-			_	s retention and conflict of interest. It these policies with fidelity.	
Subrac	ipients should have experience i	n providing	out of scho	ol time program:	ning using public	funds in addition to the	
						tions to create accounting systems	
•	perly account for budgeted funds	•		• •	ciicii organiza	dono to create accounting systems	
*For de	etails related to each policy and p	procedure p	lease see th	ne relevant indica	tor		
			M	CU Review			

[Agency Name] 13 | Page

The 2020-21 Monitoring and Comphanice Tool	
Additional obligations:	
Evidence of Program Implementation:	
	ACU Notes
Monitoring Process	
Monitoring Results	
Performance Level  ☑ Choose an item.	Citation(s) 2020-21 RFP Statewide: ; UGG: 2 CFR §200.303
Concerns Identified	
How the subrecipient may resolve the issue:	
C19 Subrecipient Response:	
C20 – Allowable Expenses	
<ul> <li>In accordance with 2 CFR 200.403, costs must meet the follo</li> <li>Be necessary and reasonable for the performance of</li> <li>Be allocable to the 21<sup>st</sup> CCLC program.</li> <li>Conform to any limitations or exclusions set forth 2 or amount of cost items.</li> <li>Be consistent with policies and procedures that applications subrecipient.</li> <li>Be accorded consistent treatment. (A cost may not be for the same purpose in like circumstances has been</li> <li>Be determined in accordance with generally accepte</li> <li>Be adequately documented.</li> <li>In addition, the subrecipient's current RFA/RFP identifies several indirectly. Subrecipients are expected to consult the FDOE 22</li> </ul>	FR 200, Subpart E, Cost Principles or in the Federal award as to types uniformly to both federally-financed and other activities of the assigned to a Federal award as a direct cost if any other cost incurred allocated to the Federal award as an indirect cost.)
	ico review
Additional obligations:	
Staff Interviews Lesson	
	ACU Notes
Monitoring Process  Monitoring Results	
Performance Level	Citation(s)

[Agency Name] 14 | Page

The 2020 21 Monitoring and Compilative 1001	
☑ Choose an item.	2020-21 RFP Statewide: 2.6 and 2.7; 2020-21 RFA Statewide: 4.8 and 4.9; UGG: 2 CFR 200.403
Concerns Identified	
How the subrecipient may resolve the issue:	
C20 Subrecipient Response:	
C21 – Procurement Rules and Regulation	
Program Requirement: Subrecipients must comply with the procurement rules and reagency. When a conflict exists between the state and the agent	egulation of the State of Florida and the procurement policies of their ncy requirement, the more restrictive requirement governs.
The Uniform Guidance requires that all costs be reasonable to competition. Subrecipients must obtain price or rate quotes for obtain at least three quotes, or an approved alternative, to me	rom an adequate number of qualified sources. Subrecipients must
required. A cost analysis must be included in the application a  • Salaries of the agency leadership positions if any porti  • Equipment with a unit cost of \$1,000 or more; and  • Contractors with an agreement totaling \$5,000 or mo  • Cost exceeding \$3,000 per full day of service or delive  • Aggregate purchases with a single vendor totaling \$10  Debarment  Subrecipients must ensure that all vendors and contractors (e	re on an annual basis.
agency.	CU Review
Additional obligations:	- Concrete
5.1. (5	
Evidence of Program Implementation:  ☐ Approved Application ☐ Select Tr ☐ Correspondence ☐ General	ransactions
	ICU Notes
Monitoring Process	
Monitoring Results	
Performance Level  ☑ Choose an item.	Citation(s) 2020-21 RFP Statewide: 2.17; 2020-21 RFA Statewide: 4.19; FDOE Green Book (2015): C20; UGG: 2 CFR 200.318 - 200.326; 216.3475 F.S; OMB Memorandum M-18-18
Concerns Identified	
How the subrecipient may resolve the issue:	
C21 Subrecipient Response:	

[Agency Name] 15 | Page

### C22 – Conflict of Interest

#### **Program Requirement:**

Uniform Guidance requires that programs receiving federal funds must have a written conflict of interest policy and procedure that ensures the following:

- No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.
- If the subrecipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the subrecipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest mean that because of relationships with a parent company, affiliate, or subsidiary organization, the subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

Subrecipient must disclose in writing any potential conflict of interest to the 21st CCLC program office, including all familial

relationships in their staff and contractors v	working	with the 2	1 <sup>st</sup> CCLC program.	. 0	, 3
		М	CU Review		
Additional obligations:					
Evidence of Program Implementation:  ☐ Policies and Procedures ☐ Staff Interviews		Select T	ransactions		Correspondence
		N	ICU Notes		
Monitoring Process  Monitoring Results					
Performance Level  ☑ Choose an item.					9-20 RFA Statewide: 2.10; UGG: 2 18(c)(1-2); FDOE Green Book
Concerns Identified					
How the subrecipient may resolve the issu	e:				
C22 Subrecipient Response:					
C23 – Financial Management					
Program Requirement: Subrecipients must implement cash manag regulations, provided that the procurement		m to appl	icable Federal laws and t		
		M	CU Review		
Additional obligations:					
Evidence of Program Implementation:  ☐ Approved Application ☐ Staff Interviews		Select T	and Procedures ransactions ICU Notes		General Ledger Other
Monitoring Process		IV	ico notes		
Monitoring Results					

[Agency Name] 16 | Page

Other

	The 2020 21 Monitoring and compliance roof				
Perfo	ormance Level Choose an item.				9-20 RFA Statewide: 4.2 and 4.3; 200.305, 200.403, 200.327 200.328
Conce	rns Identified				
How t	he subrecipient may resolve the issue:				
C23	Subrecipient Response:				
C24 –	Time and Effort				
Subre	am Requirement: cipients must have the necessary internal con cipients must maintain appropriate document	-			
	al regulations require that subrecipients have w time and effort is tracked and a procedure			•	ure that includes the requirements
Emplo distrib	nnel Activity Reporting (PAR) yees who work on multiple activities or cost of the cost of	•			——————————————————————————————————————
Emplo certific certific certific	Annual Certification  yees that work on a single federal award or contact that charge cation. Federal regulations require that charge cations and that the employees worked solely cations need to be prepared at least semi-annowledge of the work performed by the empty.	es for the of the of the of the on that produced in the of	employee's salaries and rogram for the period co	wages ne vered by	ed to be supported by period the certification. These
Federa Schoo submi	a School District Substitute Time Distribution al regulations allow for states to approve substitute Time Distribution al regulations allow for states to approve substitution to an agreement with the talk allowed an used to document employee work schedule	stitute pro he FDOE t only eligible	cesses or systems for allo o utilize a substitute time e employees will particip	e distribu ate in the	tion reporting system. The LEA must substitute system and that the
Under	the Florida School District Substitute agreer Completed daily during the reporting month Completed three times a year; September, Completed and signed by the employee and Reviewed and signed by the project manage	hs. January ar d a supervi	nd May	owledge o	of the work performed.
an ind	EA may use alternative documentation – such ividual who works on multiple activities or comemployees would be permitted on a semi-ann	st objectiv			
		М	CU Review		
Additi	onal obligations:				
Evider	Approved Application  Timesheet	Policies Semi-Eff	and Procedures fort		Staff List Personnel Action Report

[Agency Name] 17 | Page

Certifications

(PAR)

Performance Level

The 2020-21 Monitoring and Compliance 1	001	
	MCU Notes	
Monitoring Process		
Monitoring Results		
Performance Level  ☑ Choose an item.		D; FLDOE's Agreement On A Substitute Time ing System; FDOE Green Book (2015): D19
Concerns Identified		
How the subrecipient may resolve the issue:		
C24 Subrecipient Response:		
C25 – Travel		
Program Requirement: All subrecipients are required to conduct travel conditions of the award.  Travel policies must include the process for initi	·	
<ul> <li>Meal reimbursements (\$6 for breakfast, hotel stay, and .445 cents per mile.</li> <li>A printed map for the computation of m Transportation or available through wel</li> <li>A copy of agenda for meetings.</li> <li>Copies of receipts (hotel, rental car, gas</li> <li>Copies of paid checks or bank statemen</li> <li>All travel-related expenses must have a supervisor.</li> </ul>	, \$11 for lunch and \$19 for dinner concludes the official state rooms bsites.  To tolls, etc.).	or \$36 per day), a maximum of \$175 per night for ad map issued by the Department of
Section 112.061(14), Florida Statutes, Applicabil Metropolitan Planning Organization, establishes rates other than those established by Section 12 accordance with the statute and include with the policy, or rule, and have a detailed description of	s statutory authority allowing speci 12.061 (6)(a), (6)(b), and (7)(d), Flor ne project application a copy of the	fied entities to establish travel reimbursement
Changes in travel rate(s) based on, Section 112. amendment and have a detailed description of		ntation must be included with the project
amenament and have a actanca description of	MCU Review	
Additional obligations:		
Evidence of Program Implementation:  Approved Application  Other	Policies and Procedures	☐ Select Transactions
	MCU Notes	
<b>Monitoring Process</b>		
Monitoring Results		

[Agency Name] **18** | Page

Citation(s)

☑ Choose an item.	FDOE Travel Manual; FDOE Green Book (2015): C21 and D23
Concerns Identified	
How the subrecipient may resolve the issue:	
C25 Subrecipient Response:	
C26 – Property Management	
Program Requirement: Federal Requirement	
	the Uniform Guidance. Uniform Guidance, Section 200.313 Equipment an accurate accounting of equipment purchased with grant funds.
programmed useful life of one year or more shall be recor	property with a value or cost of \$1,000 or more and having a ded in the state's financial system as property for inventory purposes." hysical inventory of the property must be taken and the results
	rith a purchase value of less than \$1,000, whether classified as larded. Recipients should have a written policy on how these items will
a unit cost of \$1,000 or more on the Budget Narrative Form	rchased with federal funds, subrecipients must record <u>all</u> equipment with n (DOE 101). All additional equipment purchases with a unit cost of oved by the FDOE, require an amendment submission and approval by
<b>LEA or Agency Requirements</b> If the LEA or agency/organization threshold requirements adhere to and use the lower threshold.	are lower than the state's \$1,000, the LEA or agency/organization must
All 21st CCLC programs must have a process to secure all pe	rogram equipment and supplies.
·	and equipment purchased with 21st CCLC funds as required in the nd regulations, and the subrecipient's own policies and procedures.
	MCU Review
Additional obligations:	
	oved Application
	MCU Notes
Monitoring Process	inco notes
Monitoring Results	
Performance Level  ☑ Choose an item.	Citation(s) 2020-21 RFP Statewide: 2.14; UGG 2 CFR 200.313; F.A.C. 691-72.003, FDOE Green Book (2015): C18

[Agency Name] 19 | Page

The 2020 21 Worldoning and compila	11001					
Concerns Identified						
How the subrecipient may resolve the iss	ue:					
C26 Subrecipient Response:						
C27 – Records Retention						
Program Requirement: All subrecipients must maintain appropriational regulations. It is the responsibility of accessed and provided to the USED, FDOE designees at any time.	the subr	ecipient to	retain all financial an	d program red	cords in an auditable manner to b	
All accounts, records and other supporting from the last program activity, typically the investigation, monitoring or audit.		-				
Supporting documentation for expenditure not limited to: invoices with check number salary/benefits schedules for staff.	-					e
		M	CU Review			
Additional obligations:						
Evidence of Program Implementation:						
☐ Policies and Procedures	☐ Select Transactions ☐ Inventory Sheets		Inventory Sheets			
☐ Staff Interviews		Program			Other	
		Docume				
Navitavius Duagas		IV	ICU Notes			
Monitoring Process						
Monitoring Results						
Performance Level			Citation(s)			
<ul> <li>☑ Choose an item.</li> <li>2020-2 RFP Statewide: 2.12; 2020-21 RFA Statewide: 4.14; 21<sup>st</sup> CCL0</li> <li>Subrecipient Assurances for the 2020-21 program year</li> </ul>				_C		
Concerns Identified						
How the subrecipient may resolve the iss	ue:					
C27 Subrecipient Response:						
C28 – Supplement, Not Supplant						
Program Requirement:	-lawaant	n at a mala	wat" was vision. Cumple	manut tuminally	· · · · · · · · · · · · · · · · · · ·	

21<sup>st</sup> CCLC awards include the federal "supplement, not supplant" provision. Supplement typically means "create something to add to a program"; supplant typically means "to replace something that already exists."

21st CCLC funds can only be used to start a new program or to supplement an existing non-21st CCLC program. As such, 21st CCLC funds may not be used to supplant existing programs that are similar to 21st CCLC programs or funding that is used for programs that are similar to 21st CCLC programs. Any expenditure that supplants existing programs or funding is not allowable. Subrecipients

[Agency Name] 20 | Page

seeking to supplement an existing 21st CCLC supplant other funds.	C-like pr	ogram mu	st clearly describe h	now the 21st CCI	LC funds will supplement and not
supplant other funds.		M	CU Review		
Additional obligations:					
Friday of Dynama Implementation					
Evidence of Program Implementation:  Policies and Procedures		Staff Tir	nesheets		Observation
Staff Interviews	П		ransactions		Programmatic
Other		50.0001		_	Documentation
		N	1CU Notes		
Monitoring Process					
Monitoring Results					
Performance Level			Citation(s)		
☑ Choose an item.			2020-21 RFP State	ewide: 2.9; 2020	0-21 RFA Statewide: 2.13 and 4.10
Concerns Identified					
How the subrecipient may resolve the issu	e:				
C28 Subrecipient Response:					
C29 – Subgrant					
Program Requirement:  21st CCLC subrecipients cannot further subgany outside entity, funded agencies should C.F.R. Part 200.330 and maintain document entity.  21st CCLC programs may use contracts to further program but cannot provide or be responsimore than 25 percent of the total budget a exempt from this limitation. These exempt	comple tation to lfill som ble for mount.	ete a subred to support to the of the no the program Individual	eeds of the program Contracts Contracts Contracts Contracts Contracts Contracts	tor determinati ion was comple n. Contractors c e an allowable c certified teache	on as described in 2 eted prior to engaging the outside can provide ancillary services to the expense but cannot account for rs and transportation costs are
exempt from this initiation. These exempt	3450011		CU Review	in the approved	a buuget.
Additional obligations:					
Evidence of Program Implementation:				<u></u>	
Policies and Procedures		_	n Handbook		Observation
Staff Interviews			ransactions  1CU Notes		Other
Monitoring Process			ico notes		
Monitoring Results					
Performance Level			Citation(s)		
Consequentified			2020-21 RFP State	ewide: 2.8	
Concerns Identified					
How the subrecipient may resolve the issu	e:				

[Agency Name] 21 | Page

The 2020-21 Monitoring and Compile	ance rooi				
C29 Subrecipient Response:					
C30 – Written Agreement					
Program Requirement: All relationships with contractors must be by the contractor; clear, quantifiable and consequences for non-performance; and regulations. Contracts that exceed \$5,000	specific d any other	eliverable( information ve a cost ar	s) and the assigned pon as required by ap nalysis included in th	payment for ea plicable federa	ch deliverable; financial
		M	CU Review		
Additional obligations:					
Evidence of Program Implementation:  Policies and Procedures Staff Interviews Other		Select Ti	Contract ransactions ICU Notes		Observation Programmatic Documentation
Monitoring Process  Monitoring Results					
Performance Level   区hoose an item.			Citation(s) 2020-21 RFP States	wide: 2.8	
Concerns Identified					
How the subrecipient may resolve the iss	sue:				
C30 Subrecipient Response:					
C31 – Grants Fiscal Management Traini	ng				
Program Requirement: Community-Based Organizations (CBOs), subrecipients of FDOE grants are required the signature date of the DOE 200. The Gibead/CEO or CFO/Head of Finance.	d to comp	lete Grants al Manager	Fiscal Management ment Training and A	t Training offer	ed by the FDOE within 60 days of
		M	CU Review		
Additional obligations:					
Evidence of Program Implementation:  Approved Application Other Other		Policies	and Procedures		Grants Fiscal  Management Training  and Assessment Test
		N	ICU Notes		
Monitoring Process  Monitoring Results					
Performance Level			Citation(s) 2020-21 RFP States	wide: 2.13; 201	9-20 RFA Statewide: 4.15

[Agency Name] **22** | Page

How the	subrecipient may resolve the issue:
C31	Subrecipient Response:

[Agency Name] 23 | Page