United States Department of Labor (USDOL)
National Farmworker Job Program Grant (NFJP),
Florida Department of Education (FDOE)
Farmworker Career Development Program (FCDP)
Monitoring Manual

Purpose of Monitoring

As outlined on the Florida Department of Education (FDOE), Farmworker Career Development Program (FCDP) website, www.fldoe.org/farmworker-jobs-edu-program, the purpose of monitoring is to identify the specific areas in which a provider is in compliance or not in compliance with federal law and regulations, state statutes and rules and Office of Management and Budget (OMB) Circulars. The timely identification of non-compliance provides a framework to make changes that are expected to result in programs becoming more efficient and effective. However, a comprehensive and multi-dimensional Quality Assurance System (QAS) is a foundation for continuous improvement of services and systems both internally and externally. Our commitment to excellence supports accountability, collaboration, targeted technical assistance and fosters continuous program improvement.

Risk-Based Monitoring

Risk assessment is a process used to evaluate variables associated with workforce education grants and assign a rating for the level of risk to the Florida Department of Education and the Division of Career and Adult Education associated with each provider. The risk assessment is conducted by the Quality Assurance Team to determine the monitoring strategy appropriate for each provider. A range of monitoring strategies includes conference calls, improvement plans, full or partial self-assessment, grant reviews, etc., with the more comprehensive strategy such as an onsite visit, designated for providers deemed to be at higher risk.

Protocols

Protocols have been developed for Farmworker Career Development Program and their fiscal components. The protocols include interview questions aligned with the regulatory requirements; forms and checklists to be used for the on-site visits and other monitoring strategies are included; additional documents addressing the individual processes have also been developed.

FCDP Monitoring Resources

As deemed necessary by the United States Department of Labor/Employment and Training Administration, monitoring of FCDP direct service providers is completed on an annual basis that addresses areas of compliance including special investigations of specific grant awards. Collaboration and cooperation with Grants Management, the Inspector General's office, the Comptroller's office and others, as appropriate, is fundamental to the success of the Quality Assurance System.

The Florida Department of Education (FDOE), Farmworker Career Development Program-uses the following resources:

- **NFJP-Core Monitoring Guide-Supplement** July 2021 United States Department of Labor, Employment and Training Administration
- National Farmworker Jobs **NFJP Program Guide** June 2023
- Sub-Recipient Project Awards
- The Florida Department of Education Request for Proposal (RFP Discretionary) 2025-2026 Farmworker Career Development Program (**FCDP RFP**)
- The Florida Department of Education Request for Application (RFA Discretionary), 2025-2026 Farmworker Career Development Program - Statewide Emergency Program (**FCDP – ALPI RFA**)

Monitoring Work File

A monitoring work file consists of several types of information that, taken together, contain all the necessary documentation a reviewer needs to monitor and manage a project effectively and efficiently. The information contained in the work file supports assessments of whether the project recipient is fulfilling the specified requirements outlined in the Project Award. The purpose of the working file is as follows:

- Provides documentation that is critical in making important decisions about the project
- Provides information to the reviewer on how to advise the project recipient when seeking technical assistance
- Furnishes a chronological, up-to-date record of project activities
- Allows for a smooth transition if/when there is a change in staff

Three Components of Monitoring
- **Pre-monitoring, Review and Preparation:**
  - Request for documentation
  - Review of documents
  - Develop a plan
- **Monitoring Review**
  - Entrance conference
  - Provide technical assistance
  - Identify findings, areas of concern, observations and/or best practices
  - Collect supporting evidence for findings
  - Conclude with an exit conference
- **Post-Monitoring Activity**
  - Develop and issue a written monitoring report
  - Maintain a working file
  - Resolve findings

First Component Monitoring
Pre-monitoring, Review and Preparation
Notification and Request for Documentation include:
- ☐ Annual monitoring notification and schedule
- ☐ PowerPoint Presentation by Teams
- ☐ Specific Program Monitoring Request
- ☐ Specific Fiscal Monitoring Request

Review of documents include:
- ☐ **NFJP Program Guide**
- ☐ **NFJP-Core Monitoring Guide-Supplement**
- ☐ Project Awards:
  a. 4056C, PY2025-2026:-Complete review
  b. 4055C, PY 2024-2025: Partial reviews include closing and previous monitoring information
  c. 4054C PY 2023-2024: Partial reviews include closing and previous monitoring information
- ☐ **FCDP RFP** 2025-2026
- ☐ **FCDP – ALPI RFA** 2025-2026

Plan development include:
- ☐ Risk assessment to identify sub-recipient need for monitoring. Risk factors included:
  - Amount of federal funds
  - History of audit findings for fiscal or program
  - Spending patterns
  - Program performance goal
  - Cost per participant

☐ PY 2025-2026 monitoring method: virtual by Desktop and Microsoft Teams meetings

Second Component Monitoring
Monitoring Review
Entrance conference
☐ Virtual by Microsoft Teams platform
The core activity indicators are included in charts to provide the following criteria for the review:
☐ Provide technical assistance
☐ Identify findings, areas of concern, observations and/or commendations for best practices
☐ Collect supporting evidence for findings
Conclude with and exit conference.
☐ Virtual by Microsoft Teams platform

Third Component Monitoring
Post-Monitoring Activity
Develop and issue a written monitoring report:
☐ Assess the monitoring charts by the following results:
- Best Practices (Items that are implemented well)
- Observations (Issue that may become a concern if not attended to)
- Concerns (Issue that could become a finding if not corrected)
- Findings (Issue that violates federal regulations or state statutes)

☐ Findings and corrective actions will be identified using the following criteria:
- Condition (Clear, concise and specific statement describing the violation)
- Cause (Statement that explains why the condition occurred)
- Criteria (Standards or legal requirements that are being violated)
- Corrective Action (Actions that eliminate the cause, correct or cure the condition and allow symptoms to disappear)

☐ Compile the assessment into a monitoring report
Maintain a working file:
☐ Supporting evidence is attached to each chart indicator
☐ Boxes in this document are checked as completed
☐ Monitoring report and closing monitoring letter are attached to file
Resolve findings:
☐ Results and corrective actions are included in the monitoring report
☐ Closing monitoring letter at program year end shows resolutions

Program Request for Documentation:
☐ Annual monitoring notification and schedule
☐ PowerPoint Presentation by Teams

If any of the following items are available online, please send a separate email with the link to where the documents are located for each section.
☐ Strategic Planning:
- Policies and Procedures

- Recruitment information
- ☐ Service Design:
  - Policies and Procedures
  - Plan Vs Actual
  - Eligible Training Provider List (ETPL)
  - Targeted Occupation List (TOL)/in-demand industry sector or occupation in the service area
  - Memorandum of Understanding (MOUs) with the local CareerSource Center, educational and training providers, employers, support service agencies, others as needed
  - Outreach with the State Monitor Advocate (SMA)
- ☐ Administrative Controls:
  - Policies and Procedures for core management functions and program operations.
  - Record retention policies
  - Staff meeting minutes and sign-in sheets
  - Record retention policies
- ☐ Civil Rights:
  - Visibly posted notices.
  - Policies and procedures regarding civil rights and equal employment opportunity/nondiscrimination information
- ☐ Advisory Council:
  - Bylaws
  - Board member list (see Policy Memorandum No. 14-01)
  - Meeting minutes and sign-in sheets
- ☐ In-Demand High-Wage/High-Growth Job:
  - Policies and Procedures
  - Eligible Training Provider List (ETPL)
  - Targeted Occupation List (TOL)/in-demand industry sector or occupation in the service area
  - Placements
- ☐ Performance:
  - Performance Improvement Plan – Monthly meetings
  - Monthly Balance Performance Report (PY 2023-2024)
- ☐ Personnel:
  - Personnel policies and record of position descriptions/qualifications; hiring, promotion and termination practices
  - Staff resumes
  - Time and Effort Certification/Personnel Activity Reports (PARs)
  - Personnel certification requirements

INDICATOR COMPLETION TABLE

Below is a table identifying all the indicators that must be completed during this review. These indicators have a check mark in the CMG column and/or Supplement column.

1. Indicators that have been brought in directly from the monitoring guide to evaluate compliance or effectiveness and do not contain any additional NFJP-specific content, are marked with a check box in the CMG column.

2. Indicators that are enhanced and contain additional questions to address NFJP program requirements are marked with a check box in the Supplement column. The ETA Reviewer must look at **BOTH** sets of instructions and questions in order to evaluate compliance (C) or effectiveness (E) for the indicator. Note that an additional indicator, Data Validation, is new to the Supplement and not contained in the CMG but must be completed for this review.

CMG	Indicator	Indicator Name	Supplement
**Objective 1.a Planning and Program Design (Governance)**
☑	1.a.1	Strategic Planning	
☑	1.a.2	Service Design	☑
☑	1.a.3	Coordination and Integration	☑
**Objective 1.b Implementation**
☑	1.b.1	Designating Personnel, Staff and Hiring	☑
☑	1.b.2	Participant Recruitment Activities	☑
☑	1.b.3	Partnerships	☑
☑	1.b.4	Required One-Stop Partners	☑
**Objective 1.e Participant Services**
☑	1.e.1	Service Delivery	☑
☑	1.e.2	Priority of Service	☑
☑	1.e.3	Eligibility/Enrollment	☑
☑	1.e.4	Assessment	☑
☑	1.e.5	Participant Service Plan	
☑	1.e.6	Supportive Services	
☑	1.e.7	Training Services	
☑	1.e.8	Placement	☑
☑	1.e.9	Follow-up Services	
**Objective 2.a Project Management**
☑	2.a.1	Specific Award Conditions	
**Objective 2.e Performance Management**
☑	2.e.1	Performance Reporting	☑

CMG	Indicator	Indicator Name	Supplement
☑	2.e.2	Progress Monitoring	
	2.e.3	Data Validation *(new)*	☑
CMG	**Indicator**	**Indicator Name**	**Supplement**
Objective 2.g Records Management			
☑	2.g.1	Record Retention	
☑	2.g.2	Accessibility	
☑	2.g.3	Protected Personally Identifiable Information	
☑	2.g.4	Custody and Transfer	
Objective 2.h Personnel			
☑	2.h.1	Personnel Policy and Procedures	☑
Objective 2.i Civil Rights, Complaints, Grievances and Incident Reporting			
☑	2.i.1	Policies and Procedures	☑
☑	2.i.2	Notices	☑
☑	2.i.3	Facilities	
☑	2.i.4	Grievance and Complaint System	
☑	2.i.5	Incident Reporting	

Core Activity 1: Service Design & Delivery

Objective 1.a: Planning and Program Design

The sub-recipient has conducted all planning activities related to service design and delivery in order to accomplish all grant activities and goals.

(C/E) Indicator 1.a.1: Strategic Planning

The sub-recipient has developed a strategic approach to accomplish the goals specified in the project.

Citation

For Core Activity 1, the reviewer will be required to decide on whether an indicator is either In Compliance (C) and assess whether the state and/or local provider has met statutory requirements or the effectiveness (E) questions are qualitative and do not relate to compliance requirements and/or both and identify the appropriate citation applicable to the indicator.

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. How did the sub-recipient develop their strategic approach to accomplish the goals of the project? What organizations did they consult or what partners provided input? What economic or labor market information was used? 2. Is the sub-recipient's strategic approach aligned with the State/Local Workforce Board's priorities for meeting the workforce and economic needs of the state and/or local area? 3. What plans or procedures has the sub-recipient created to track the progress of its strategic plan?	RFA/RFP	

(C) Indicator 1.a.2: Service Design

The sub-recipient has designed a system to deliver services that accomplish the goals of the project.

Citations

CFR 685.300(c), CFR 685.420 and CFR 685.300-390

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Do the sub-recipient's actual practices of how it delivers services agree with its approved annual program plan (Balance Performance BP)? 2. Does the sub-recipient coordinate outreach with the State Monitor Advocate (SMA)? The (NFJP's) FCDP	RFA/RFP MOU Training list	

Memoranda of Understanding (MOU) with the SMA is designed to facilitate the SMA's liaison function between the NFJP and the State Workforce Agency?		
3. Does the sub-recipient have strategies to provide educational and career planning opportunities for Migrant Seasonal Farm Workers (MSFW) dependents, particularly youth? If so, describe.		

(C) Indicator 1.a.3: Coordination and Integration
Integration and coordination are supported, codified in policy, measured and evident at the leadership level of the workforce system in which the sub-recipient operates.
Citations
WIOA Section 121(b)(1)(B) and WIOA Section 121(b)(1)(A)

Provider Review Protocol CMG and NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. How is the sub-recipient integrating and partnering its program into the local workforce system (e.g., American Job Centers)? 2. What policies or MOUs has the sub-recipient established to coordinate/integrate activities? 3. How does the sub-recipient 's policies, systems and service design reduce duplication, maximize the reach of resources, ensure appropriate customer service across funding streams and reduce administrative overhead?	MOU FCDP Policies	

Objective 1.b: Implementation

The sub-recipient has implemented service design and delivery activities in order to accomplish all sub-activities and goals.

(C) Indicator 1.b.1: Designating Personnel, Staff and Hiring
The sub-recipient has the necessary staff to successfully conduct the administrative and operational duties of the FCDP grant.
Citations
NFJP FOA (e.g., FOA-ETA-20-08) and approved annual program plan
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the sub-recipient's actual staffing pattern agree with the staffing chart that is included in their application's project narrative for the most recent funding opportunity announcement or annual program plan? 2. If the sub-recipient 's staffing plan is different: How is it different? • Is the sub-recipient adequately staffed to provide all services mentioned in the RFA or RFP throughout the entire service area? • Has the sub-recipient been providing services throughout the entire service area? If not, why?	RFA/RFP FCDP Policies	

(C) Indicator 1.b.2: Participant Recruitment Activities

The sub-recipient has developed a methodology and partnership action plan to map participant recruitment activities. The sub-recipient has an effective methodology to target and recruit eligible program participants. The sub-recipient has engaged required program partners, as well as community partner networks, to maximize outreach efforts.

Citations

NFJP FOA (e.g., FOA-ETA-20-08) and Approved annual program plan

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions: 1. Does the sub-recipient focus recruitment to target eligible MSFWs and their dependents, including youth? If so, how? 2. Does the sub-recipient coordinate or consult with other organizations (other than required One-Stop partners) for outreach and recruitment strategies? Which organizations? 3. Does the sub-recipient have strategies to effectively find and recruit eligible MSFWs? If so, describe. 4. Does the NFJP sub-recipient have plans to coordinate with their SMA to effectively recruit eligible MSFWs and their dependents?	RFA/RFP FCDP Policies TEGL 18-16 Change 1 Interview	

(C) Indicator 1.b.3: Partnerships

The sub-recipient continues to engage with required partners. MOUs have been signed formalizing the relationship between each party. Partners meet with some frequency to discuss program

progress and address any issues that arise. Partners are held accountable for their responsibilities and play an active role in program functions.

Citations

NFJP FOA (e.g., FOA-ETA-20-08), CFR 653.108(I) and TEGL 8-17

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the NFJP have a compliant MOU with the SMA? (see 20 CFR 653.108(I) and TEGL 8-17). 2. Does the MOU show evidence of a strategic approach to collaborating with the SMA? 3. Does the sub-recipient's actual relationship with the SMA align with the agreements regarding how it will share information and collaborate with the SMA, as described in the MOU with the SMA? 4. Does the sub-recipient partner with other agencies and organizations, such as faith-based and other community-based organizations or organizations serving youth and other MSFW-serving organizations? Describe any partnerships listed in the program plan. 5. Does the sub-recipient refer individuals (MSFW and non-MSFW) to other One-Stop partners, as needed? If so, how? Does the process agree with the process outlined in its MOU(s) with the Local Workforce Development Board (LWDB)? 6. Does the sub-recipient partner with any initiatives in the state/service area, through the local American Job Center (AJC) system, community colleges, local businesses or other strategic partners to increase employment opportunities for MSFWs? How? 7. Does the sub-recipient coordinate with the SMA? If so, how? Note: This is covered in the NFJP/SMA MOU per TEGL 8-17. 8. Does the sub-recipient have partnerships with at least three or more employers and three or more training providers? How are those partnerships leading to higher paying, more stable employment for MSFW and addressing the business needs of the employers of the local communities?	RFA/RFP FCDP Policies TEGL 8-17	

(C) Indicator 1.b.4: Required One-Stop Partner
If the sub-recipient is a required partner in the local One-Stop delivery system as prescribed in WIOA sec. 121(b)(1)(B), it fulfills its roles and responsibilities as a required One-Stop partner.
Citations
WIOA Sec. 121(c), CFR 678.305(b)-(d), CFR 678.310, CFR 678.405(b), CFR 678.430, CFR 678.435, CFR 678.500, CFR 678.505, CFR 678.755, CFR 678.760, CFR 678.800(b), CFR 678.900(a)(c)(d), TEGL 16-16, CFR 685.220, CFR 678.400, CFR 678.420, CFR 678.415(d) , Approved Annual Plan and TEGL 17-16
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA MOU

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions 1. Does the NFJP coordinate with required One-Stop partners? How?	FCDP Policies RFA/RFP TEGL 8-17 Interview	
Memoranda of Understanding (MOU) 678.500, 678.505, 678.755 and 678.760 1. Has the Local Workforce Development Board (LWDB), with the agreement of the CEO, developed and entered into a signed MOU with all of the required One-Stop partners? 2. Does the MOU contain: • A description of services to be provided through the One-Stop delivery system, including the manner in which the services are to be coordinated and delivered through the system? • One-Stop operating budgets identifying the costs of the services and the operating costs of the system including an Infrastructure Funding Agreement (IFA) for the infrastructure costs of One-Stop Centers in accordance with CFR 678.700 - CFR 678.755 and funding of the shared services and operating costs of the One-Stop delivery system described in CFR 678.760? • Methods to provide access to services? • Methods for referring individuals between the One-Stop operators and the sub-recipient for appropriate services and activities? • Provisions specifying the MOU's duration and the procedures for amending it? • Identification of other contributions made to the One-Stop system through other avenues?	FCDP Policies RFA/RFP TEGL 8-17 Interview	

• A description of the modification process? • Signatures of all the required partners' authorized representative? • Appeals process and the resulting update to the MOU? 3. Does the MOU contain the following: information related to infrastructure funding (CFR 678.755): The period of time in which the IFA is effective. (This may be a different time period than the duration of the MOU.) • Identification of a One-Stop operating budget, including infrastructure costs in the IFA and additional costs, which will be periodically reconciled against actual costs incurred and adjusted accordingly to ensure that it reflects a cost allocation methodology that demonstrates how infrastructure costs are charged to each partner in proportion to its use of the One-Stop Center and relative benefit received and that complies with CFR 200.405? • Description of the process to be used among partners to resolve issues during the MOU duration period when consensus cannot be reached? • Description of the periodic modification and review process to ensure equitable benefit among One-Stop partners? 4. Do MOUs contain any additional costs agreed upon by the sub-recipient, including: • Applicable career services that must be included? • Indicate shared operating costs and shared services that may be included? 5. Does the sub-recipient use a portion of funds made available under their program's authorizing Federal law (or fairly evaluated in-kind contributions) to pay the additional costs relating to the operation of the One-Stop delivery system (CFR 678.760)? NFJP Specific Questions 6. Does the NFJP-FCDP have a compliant MOU with all applicable LWDBs?		

Objective 1.e: Participant Services

The sub-recipient is implementing the required service delivery strategy outlined in its (RFA or RFP) and is

providing all required services to participants.

(C) Indicator 1.e.1: Service Delivery

The sub-recipient provides access to the full array of participant services stipulated in the grant agreement.

Citations

NFJP Grant Terms and Conditions, TEGL 18-16 Change 1, CFR 685.300(b), CFR 685.330, CFR 685.340, CFR 685.350, CFR 685.360, CFR 685.370, CFR 685.380, CFR 685.550 and NFJP FOA (e.g., FOA-ETA-20-08)

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions 1. Is the sub-recipient providing the career services described in WIOA Secs. 167(d) and 134(c)(2) and CFR 685.380? Is the sub-recipient providing full range of services in the state/service area that are included in the approved program plan? If the sub-recipient is providing services through an American Job Center, is the delivery of career services to eligible MSFWs by the sub-recipient and through the AJC discussed in the required MOU between the LWDB and the sub-recipient? See CFR 685.340. 2. Is the sub-recipient providing services through a case management approach emphasizing customer choice and ensure all services are focused on customer's needs to achieve each participant's employment goals or housing goals? 3. Is the sub-recipient providing training activities described in WIOA Secs. 167(d) and 134(c)(3)(D) and CFR 685.380? 4. Is the sub-recipient providing services to eligible MSFW youth participants aged 14-24 as described in CFR 685.370? 5. Is the sub-recipient providing related assistance services as described in CFR 685.380? 6. How has the sub-recipient leveraged available alternative resources? 7. How is the sub-recipient coordinating continuously with the SMA, Farm Labor Specialists and other community-based partners in providing services to H-2A workers?	RFA/RFP FCDP Policies	

(C) Indicator 1.e.2: Priority of Service

The sub-recipient has an effective system for ensuring priority of services.

Citation

NFJP Grant Terms and Conditions, NFJP FOA (e.g., FOA-ETA-20-08)

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions 1. Do written policies and procedures ensure priority of service to veterans? What policies and practices are in place to ensure sub-recipient's (project) staff routinely verify veteran status to facilitate priority of service? 2. How is the sub-recipient ensuring that data on characteristics of individuals served is fully recorded and reported?	EmployFlorida EEO	

(C) Indicator 1.e.3: Eligibility/Enrollment
The sub-recipient adheres to eligibility requirements when enrolling participants.
Citations
WIOA Sec. 167(i), CFR 685.110, CFR 677.150(b) , TEGL 18-16 Change 1 and NFJP FOA (e.g., FOA-ETA-20-08)
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes

1. Does staff correctly determine that all participants are eligible for services? If not, why?
2. What tools do staff use to gather eligibility documentation and make decisions about eligibility?
3. Is there training provided on eligibility documentation and determination?
4. Is the sub-recipient applying the correct definitions below to determine whether individuals qualify for services? See definitions in CFR 685.110:
    Eligible Seasonal Farmworker
    Eligible Migrant Farmworker
    Eligible MSFW Youth
    Dependent of an eligible MSFW
5. How do staff determine whether eligible individuals are participants or reportable individuals? Review participant files and organizational policies.
 	
File Review
1. Is the documentation in each case file sufficient to fully support the eligibility determination? Determine the date eligibility was established and when the first service was provided. If
	FCDP Policies
	RFA/RFP
	TEGL 18-16 Change 1
	Interview
	EmployFlorida (EF)
	NFJP Program guidance	

applicable, ensure eligibility is verified prior to the provision of services.		
2. Are there any participants who are ineligible?		

(C) Indicator 1.e.4: Assessment

The sub-recipient administers participant assessments that accurately gauge participant capacity/aptitude and identify participant skills/interests. The results of assessments are used to customize participant service strategy and to ensure positive outcomes for each participant. The sub-recipient utilizes assessments as one of many tools to provide quality services to its participants.

Citations

CFR 685.330

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. What assessments are required by the project? How must they be documented? 2. At what point(s) in service delivery does the sub-recipient assess participants? What types of assessments do the sub-recipient employ? 3. Does the sub-recipient ask participants for any other assessments they may have completed with a partner program/organization? 4. How are assessments used to customize participant services and inform the participant service plan? How do assessments help determine suitability for training, educational course work and/or employment? 5. Which, if any, assessments are used periodically throughout the period of performance to gauge participant progress? 6. What type of assessments are employed and how do they help facilitate migrant and seasonal farmworkers' access to NFJP services and other critical services? 7. Is a sub-recipient's career assessment used to identify an individual's skill level, education and career goals and other service needs? Note: Use career assessments in a meaningful way rather than to prequalify or "screen out" potential participants. 8. Does the sub-recipient implement strategies to address a participant's needs as identified through career planning, an objective assessment and/or an Individual Employment Plan (IEP)? If so, describe assessment approach.	FCDP Policies RFA/RFP TEGL 10-16 Change 2 NFJP Program guidance	

9. Are services provided through a case-management approach emphasizing customer choice?		

(C/E) Indicator 1.e.5: Participant Service Plan (Individual Employment Plan)

A participant service plan is developed based on the participant assessment and includes an appropriate combination of services to address their needs and support desired outcomes. The plan is revisited periodically to reflect participant progress and to address any items that might have changed over time.

Citation

For Core Activity 1 only, the reviewer will be required to decide whether an indicator is either (C), (E) or both and identify the appropriate citation applicable to the indicator.

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. How does the sub-recipient ensure that the participant service plan/Individual Employment Plan (IEP) identifies and meets specific needs of each individual participant? 2. How do case/program managers engage participants in the development of the participant service plan/IEP? 3. How does the participant service plan/IEP include integrated partner services, as appropriate, to meet individual outcomes?	RFA/RFP FCDP Policies TEGL 18-16 Change 1 NFJP Program guidance	
File Review		
1. Is participant service plan/IEP included in the participant file? 2. Does the participant service plan/IEP reflect the needs and barriers identified through the assessment process? 3. Is there evidence in the file that the case manager discussed the assessment results with the participant and that they jointly developed the participant service plan/IEP? 4. Does the participant service plan/IEP include both short- and long-term goals? 5. Do the goals align with the participant performance outcomes identified in the grant (i.e., employed, measurable skills gain, employment retention, credential attainment)? 6. Do the case notes document that there is ongoing contact between the case manager and the participant, that the participant's progress is being tracked and that the service plan is		

updated when any change in circumstances, goals or planned activities and services occurs?		
7. Are there any extended lapses in service? If yes, ask the case manager to explain why.		

(C/E) Indicator 1.e.6: Supportive Services

Supportive services are being provided to participants as needed to overcome barriers to participation in and completion of the participant service plan.

Citation

NFJP FOA (e.g., FOA-ETA-20-08)

Supportive service resources may include, but are not limited to, transportation, childcare, dependent care, housing and needs-related payments that are necessary to enable an individual to participate in project activities.

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

FDOE Policy Memorandum **FCDP Policy Update for Supportive Services FCDP SS Policy Update**

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Are there written policies and procedures for the provision of supportive services? If yes, how is staff trained on these policies and procedures? 2. How does the sub-recipient determine whether a participant needs supportive services? What financial needs analysis is conducted to identify and document financial barriers to participation that can be overcome through supportive services? 3. Are any supportive services provided through partner organizations? If yes, what are the partner-provided services? What is the mechanism used to request support from partners? What follow-up is conducted to ensure that the participant actually received the service? 4. Are there any specialized supportive services that are being provided in accordance with the FOA (e.g., financial literacy, mental health counseling, etc.)? 5. Does the sub-recipient provide supportive services and needs-related payments? If so, is there an approved written policy or procedure for the provision of needs-related payments? 6. How does the policy or procedure ensure that needs-related payments are essential to participant engagement in the program activities? What documentation is required for needs-related payments?	FCDP Policies RFA/RFP NFJP Program guidance Worksheet A, B and C Employ Florida (EF)	

File Review		
1. Do the case notes and participant files identify the barriers that may prevent the participant from participating in and successfully completing the participant service plan? 2. Is there evidence that supportive services have actually been provided in accordance with both the plan and the sub-recipient's policies and procedures?		

(C/E) Indicator 1.e.7: Training Services

Participants receive training as needed to progress toward achieving their employment goals.

Training is in an in-demand occupation and delivered by an accredited provider, as applicable.

Citations

For Core Activity 1 only, the reviewer will be required to decide whether an indicator is either (C), (E) or both and identify the appropriate citation applicable to the indicator.

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Is the sub-recipient providing the full range of training services stipulated in the project agreement? If not, why? Does this require a Scope of Work (SOW) change? 2. Does the range of training options include work-based training? If so, does the sub-recipient have MOUs or work-based training/OJT agreements/contracts/registered apprenticeship agreements in place? 3. For participants receiving training to advance along a career pathway, what training costs does the grant provide? Are there training costs that are covered through financial aid or through other leveraged funds? 4. How does the sub-recipient ensure the participant can continue on the pathway without continued funding?	RFA/RFP FCDP Policies NFJP Program guidance Employ Florida (EF)	
File Review		
1. If training is needed to meet an employment goal, does the file reflect that a training plan has been developed that is consistent with achieving the employment goal? 2. Do participant files reflect regular contact between case managers and participants to		

discuss the participant's progress toward employment goals? 3. If the participant is not on track to complete the training, what has the case manager done to address the problem?		

(C) Indicator 1.e.8: Placement
Sub-recipient provides job search, referral and other services that help participants obtain employment.
Citations
Approved Annual Plan, NFJP FOA (e.g., FOA-ETA-20-08)
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions 1. Is the sub-recipient complying with the guidance in TEGL 14-18, TEGL 23-19 and other guidance related to performance reporting? 2. How do the sub-recipient's policies and procedures to provide job search, referral and other services that help participants obtain employment align with their established MOUs with the SMA and LWDB? 3. Does the sub-recipient have policies and procedures in place to determine how it will work with others to help participants obtain employment and how they will count towards performance calculations? 4. Does the sub-recipient have policies and procedures in place to determine how it will determine placements, including those who are co-enrolled in other WIOA funded services and dual enrolled in another NFJP funded program?	RFA/RFP MOU FCDP Policies Employ Florida (EF) Interview	

(C/E) Indicator 1.e.9: Follow-up Services
The sub-recipient maintains frequent contact with participants and provides allowable services to
help ensure successful grant-related outcomes.
Citation
For Core Activity 1 only, the reviewer will be required to decide whether an indicator is either (C), (E) or both

and identify the appropriate citation applicable to the indicator.
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. What is the sub-recipient's written plan for providing follow-up services to project participants who successfully completed the program? What follow-up services are being provided to the participants? 2. Do case managers stay in regular contact with participants' post-program completion? Is there a policy or procedure that defines and requires "regular contact" with project participants? If yes, how is "regular contact" defined? How does the sub-recipient achieve the standard in the definition? 3. Where follow-up is not a requirement, how does the sub-recipient determine whether follow-up is necessary? 4. Does the sub-recipient require follow-up with participants who did not complete the program or failed to achieve program goals such as employment? If yes, what does that follow-up look like (i.e., method of communication, timeframe that follow-up is conducted, strategies for reaching unresponsive participants, etc.)?	RFA/RFP FCDP Policies TEGL 18-16 Change 1 NFJP Program guidance	

Core Activity 2: Grant Operations

Objective 2.a: Project Management
The sub-recipient has an adequate system in place to manage the project, including any specific award conditions, project modifications and closeout requirements.

(C) Indicator 2.a.1: Specific Award Conditions
The sub-recipient has award conditions that may include an industry focus, occupational targets, certain populations to be served and allowable project activities specified by ETA upon which it must adhere to.

Citations
CFR 200.207
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. What systems or procedures does the sub-recipient have in place to monitor varying components (industry focus, occupational targets, specific populations/eligible participants and an arrangement of activities and services) of the project that will allow it to meet the conditions in the project award?	RFA/RFP FCDP Policies Interview NFJP Program guidance Employ Florida (EF)	

Objective 2.e: Performance Management

The sub-recipient maintains a performance management system to manage, track and measure performance and operating goals, indicators, milestones and expected.

(C) Indicator 2.e.1: Performance Reporting
The sub-recipient adheres to Office of Management and Budget (OMB) reporting package requirements for the sub-awards including accurate, complete and timely submission of reports that compare actual results to planned results, describes obstacles to achievement of sub-objectives and provides details on corrective actions.
The sub-recipient has sufficient infrastructure to accurately report on required performance measures. The sub-recipient ensures its sub-recipients collect and input data according to project requirements.

Citations
CFR 200.328(b)(1) , TEGL 23-19, USDOL Grant Terms and Conditions, NFJP Grant Agreement, CFR 685.400 and TEGL 14-18
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions 1. Does the sub-recipient's performance results meet the targets negotiated for the PY? 2. Does the sub-recipient submit monthly reports on a timely basis for each month? 3. Are the sub-recipient's policies and procedures related to calculation for each WIOA indicator of performance,	RFA/RFP FCDP Policies Interview Employ Florida (EF) NFJP Program guidance TEGL 14-18	

including tracking of exit dates and type of services that trigger participation, aligned with the ETA guidance, including TEGL 14-18?		

(C) Indicator 2.e.2: Progress Monitoring

The sub-recipient has a performance monitoring tool that compares planned to actual results, identifies causes of low performance, establishes corrective action plans and focuses on continuous improvement through regular review and analysis of relevant performance data.

Citation

CFR 200.328(b)(2)(i) and CFR 200.329(c)(2)(i)

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions 1. Does the sub-recipient have a project-specific monitoring tool or guide to assess compliance with award requirements and compare planned project performance to actual performance? 2. Does the sub-recipient compare a plan versus actual for programmatic and financial results for the current period? 3. Are the results of the monitoring activity documented and utilized for continuous improvement of the sub-program? Performance Questions 4. What corrective actions have been taken by the sub-recipient to address current and past challenges? 5. What tools does the state and local area use to monitor or assess progress toward performance goals, Governor's priorities and other workforce system goals? 6. How does the state track both its own progress toward performance goal attainment and that of its local areas? 7. How is customer satisfaction information, from job seekers and employers, being collected? How are the results used? 8. How does the local area utilize all the performance management report features of the Management Information System?	RFA/RFP FCDP Policies NFJP Program guidance NFJP Supplement to the Core Monitoring Guide Interview	

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
9. What kind of reports do the sub-recipient commonly utilize to aid their performance management? 10. How is performance data used for corrective action and continuous improvement? 11. Have any local areas been sanctioned for low performance? 12. How does the sub-recipient apply sanctions to underperforming sub-recipients? 13. What evidence is used to determine whether a sub-recipient should be sanctioned?		

(C) Indicator 2.e.3: Data Validation

The sub-recipient has a system in place to ensure data submitted for performance reporting is valid and reliable. The sub-recipient has a shared data validation framework that ensures consistency and comparability across programs and complies with USDOL parameters and source documentation requirements.

Citations

NFJP Grant Agreement, CFR 677.240, TEGL 07-18 and TEGL 23-19

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions 1. Is the sub-recipient's retaining records in compliance with the federal records retention rule, including all virtual or electronic data, which is also a record which must be retained? 2. For all data elements listed in the allowable types of source documentation chart in Attachment II of TEGL 23-19, do source documents collected match the sub-recipient's policy? Is that policy within the framework of the federal data validation guidance? 3. For other data elements not included in TEGL 23-19, Attachment II, does the sub-recipient have a policy which states what the allowable source documents are and are the documentation requirements at intake not unreasonably arduous so as to create a barrier to program enrollment?	RFA/RFP FCDP Policies TEGL 18-16 Change 1 NFJP Program guidance Employ Florida (EF) Interview	

4. Did the sub-recipient's conduct data validation in compliance with TEGL 23-19 at least annually covering all of the data elements in Attachment II? (ETA recommends quarterly).		
5. Did the sub-recipient provide a sample of records that were drawn randomly with a large enough sample size to reasonably detect trends in reporting or source documentation errors among data elements?		
Performance Questions		
6. What is the sub-recipient's data validation strategy?		
7. What software, if any, is used to conduct data validation?		
8. Does the sub-recipient use a specific statistical validation sampling methodology?		
9. How is it employed? • What does the sub-recipient deem a sufficient representation of records for each program and for each required element in that program?		
10. Does the written procedure contain a description of the process for identifying and correcting errors or missing data? • How are electronic data checks performed? • What is the process for identifying and correcting errors or missing data?		
11. How does the sub-recipient train appropriate programs staff on data validation? • How often does training occur?		
12. How are monitoring protocols linked to the data validation policy and procedures?		
13. How does the sub-recipient ensure the data validation procedures are being followed?		
14. How often does the sub-recipient conduct data integrity reviews of program data? • Who conducts those reviews?		

15. What does a typical data integrity review entail? 16. How are the results memorialized? • How are the results used? 17. How does the sub-recipient document the correction of missing and erroneous data identified during a review? 18. How does the sub-recipient maintain records such as copies of worksheets on data elements or records reviewed, frozen quarterly wage records for wage matching used for reporting outcomes, trends in common data accuracy issues, error rates and corrective action efforts made after data validation reviews? 19. How does the sub-recipient assess the effectiveness of the data validation process? • How often does this type of assessment occur? 20. How does the sub-recipient utilize quarterly feedback provided by DOL regarding performance report anomalies, outliers and other potential data quality issues? 21. How does the sub-recipient validate information included in the WIOA annual report? Where self-attestation is used as an acceptable form of source documentation, how often does the sub-recipient perform a data integrity review to ensure the validity and reliability of those elements? 22. Is the sub-recipient meeting the projected number of participants for the program year and the grant		

Objective 2.g: Records Management

The sub-recipient maintains a system and implements procedures to manage and secure all financial records, supporting documents, statistical records and all other records pertinent to the federal award.

(C) Indicator 2.g.1: Record Retention
The sub-recipient has an appropriate policy and procedure for the retention of records pertinent to the federal award that meets the requirements of applicable federal laws, regulations or grant agreement purposes.
Citations
CFR 200.333

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Has a record retention schedule been established for the project records with appropriate dates when records are no longer subject to retention? 2. Does the sub-recipient have a designated staff person with custodian of record duties? 3. If records are in an electronic medium, is the medium likely to be outdated in three years and not accessible?	RFA/RFP FCDP Policies NFJP Program guidance Employ Florida (EF)	

(C) Indicator 2.g.2: Accessibility

The sub-recipient must maintain accessible records for the purposes of audits, examinations, excerpts and transcripts. This includes making personnel available for interviews and discussions related to project records.

Citations

CFR 200.336

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Are project records accessible and available for timely review by authorized officials and representatives? 2. Are personnel responsible for the creation, maintenance and retention of records available for interview upon request?	FCDP Policies RFA/RFP Employ Florida (EF) Interview	

(C) Indicator 2.g.3: Protected Personally Identifiable Information (PII)

The sub-recipient takes reasonable measures to safeguard PII and other information that is deemed sensitive or confidential according to applicable privacy laws and obligations of confidentiality.

Citations

CFR 200.303, CFR 200.337, TEGL 39-11 and USDOL Grant Terms and Conditions

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the sub-recipient have reasonable internal controls in place and in effect to	RFA/RFP FCDP Policies NFJP Program guidance	

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
safeguard protected PII consistent with the requirements of the project award? 2. Does the sub-recipient appropriately secure sensitive and confidential information collected and retained for the purposes of including restricted access limited to necessary personnel?	TEGL 39-11	

(C) Indicator 2.g.4: Custody and Transfer
The sub-recipient's record retention policy has safeguards to ensure the maintenance and custody of project records under various circumstances.
Citations
CFR 200.334 and CFR 2900.18

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the record retention requirement address circumstances under which custody of the records should be transferred to the sub-recipient? 2. Is there a disaster plan in place to ensure that records are adequately safeguarded in a time of a disaster? Are there back up files? 3. If applicable, does the sub-recipient have procedures to retain its sub-recipient 's records as directed by the Employment and Training Administration (ETA) after the grant's period of performance? 4. Does the provider have procedures in place to set aside project funds for record retention activities subsequent to the project's period of performance?	RFA/RFP NFJP Program guidance Interview	

Objective 2.h: Personnel

The project recipient's management and staffing are aligned with the Statement of Work (SOW), State Plan or project plan and designed to assure responsible and ethical management of the project.

(C) Indicator 2.h.1: Personnel Policy and Procedures
The project recipient has a current written personnel policy (including hiring process and procedures) that meets the requirements of applicable federal laws and regulations on file and enforces it.
Citations
CFR 200.430(a)(1)-(2) , NFJP FOA (e.g., FOA-ETA-20-08), CFR 653.108(l) and TEGL 8-17
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions 1. Does the project recipient have a plan to enhance staff skills and operations? 2. Does the project recipient offer training to enhance staff skills to effectively work with MSFWs and provide career services, training, related assistance and housing services? 3. Are staff, including case managers, participating in training on Labor Market Information (LMI) to ensure participants are receiving data on industry sectors and occupations in demand or identified by the applicant? 4. Are staff receiving training on how to conduct outreach to MSFWs and employers? 5. Are staff receiving training on how to leverage partnerships to build an effective training program for participants? 6. Are staff receiving training on how to effectively serve MSFWs who experience barriers to employment using a trauma-informed approach?	RFA/RFP TEGL 8-17 NFJP Program guidance Employ Florida (EF) Interview	

Objective 2.i: Civil Rights, Complaints, Grievances & Incident Reporting

The project recipient has a system in place to ensure the Federal Civil Rights complaints, program complaints, grievances and incidents are handled properly and in accordance with Federal requirements.

(C) Indicator 2.i.1: Policies and Procedures
Policies and procedures are in place that demonstrate the project recipient's compliance and commitment to the requirements of applicable civil rights laws and regulations.
Citations
Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Age Discrimination Act of 1975, The Americans with Disabilities Act of 1990, ADA Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, WIOA sec. 188, CFR 200.300, CFR 2900.4, CFR Part 31, CFR Part 32, CFR Part 35, CFR Part 37, CFR Part 38, CFR Part 25, CFR Part 658, CFR 683(F), CFR 653.108(l) and TEGL 8-17
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
NFJP Questions	RFA/RFP	

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes

1. Does the project staff understand the difference between the Employment Service and Employment-Related Law Complaint System and the WIOA Complaint System?
2. Does the project staff understand how Apparent Violations are processed by the State Workforce Agency (SWA)?
3. Are all complaints handled by the same staff? NFJP complaints only?
4. Does the project recipient have policies and procedures in place when an individual wants to complain about:
  • The project recipient's NFJP services (WIOA Complaint System)?
  • The SWA/American Job Center Wagner-Peyser services (Employment Service and Employment-Related Law Complaint System)?
  • Employers (Employment Service and Employment-Related Law Complaint System)?
  • Job Service (JS)-related complaints CFR 658.410(c)(1)?
5. Do project recipient practices comply with agreements made in the LWDB MOU and the MOU with the SMA?
6. Have there been any JS-related NFJP complaints against employers in the past year? If so, how were they handled?
	FCDP Policies
	Interview
	TEGL 8-17
	NFJP Program guidance
	Employ Florida (EF)	

(C/E) Indicator 2.i.2: Notices
Notices (in languages appropriate to the populations served) are visibly posted to inform staff, project participants and service providers of the discrimination complaint process, EO and Section 504 policies.

Citations
Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Age Discrimination Act of 1975, The Americans with Disabilities Act of 1990, ADA Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, WIOA sec. 188, CFR 200.300, CFR 2900.4, CFR Part 31, CFR Part 32, CFR Part 35, CFR Part 37, CFR Part 38, CFR Part 25 and System Poster (see sample) Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have written policies and procedures that distinguish	RFA/RFP FCDP Policies	

between different types of complaints, which system they fall into and how to handle them? 2. Are notices prominently posted in a reasonable number of places, including electronic medium, to include administrative and service delivery areas and are they available in appropriate formats to individuals with visual impairments? 3. If a significant number of the population eligible to be served speaks a language or languages other than English, has the project recipient taken reasonable steps to provide the notice in the appropriate language(s)? 4. Do employment notices, participant recruitment flyers or other written materials published by the project recipient contain a statement providing the required written EO notice? NFJP Questions 5. If co-located with a SWA, has the project recipient posted the SWA's poster for the Employment Service and Employment-Related Law Complaint System?	Interview TEGL 8-17 NFJP Program guidance Employ Florida (EF)	

(C) Indicator 2.i.3: Facilities

The project recipient's location and facility or part of the facility, is physically accessible to and usable by people with disabilities, individuals with limited English proficiency and individuals who are pregnant, have had a child or have related medical conditions.

Citations

Title VI and Title VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Age Discrimination Act of 1975, The Americans with Disabilities Act of 1990, ADA Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, WIOA sec. 188, CFR 200.300, CFR 2900.4, CFR Part 31, CFR Part 32, CFR Part 35, CFR Part 37, CFR Part 38 and CFR Part 25

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the location and facility meet physical access requirements? 2. Are services provided at the project recipient's office(s) accessible to handicapped individuals?	RFA/RFP FCDP Policies Interview TEGL 8-17 NFJP Program guidance Employ Florida (EF)	

Provider Review Protocol NFJP-FCDP Questions		Methods of Collection/ Examples of Documentary Evidence	Notes
3.	Does the location and facility meet the requirements for individuals with limited English proficiency?		
4.	Does the location and facility meet provide accommodations for participants and other beneficiaries of the workforce system?		

(C) Indicator 2.i.4: Grievance and Complaint System

If ETA/FLDOE-FCDP has imposed additional specific award conditions on the project recipient, the project recipient is adhering to them.

Citations

WIOA Sec. 188, CFR 683.600-683.650, CFR Part 658, CFR 683.700 and USDOL Grant Terms and Conditions

Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have a written procedure for grievances or complaints alleging violations of the WIOA? If the project recipient has a state-wide EO office, obtain written grievance or compliant procedure form that office. 2. Does the policy address the following? Informing participants and other interested parties of the process and their acknowledgement of receipt of this information. • Acknowledging receipt of a complaint. The recipient should notify the complainant as soon as possible that the complaint was received and that it will be handled in accordance with established procedures and timeframes. The recipient should also notify the complainant what additional information is needed (if applicable) and identify the next step in the process and when that will take place. • Written notice of final resolution. After the complaint has been investigated, a written decision must be issued and provided to both parties. This information must include the allegation and issues, a statement of the facts, conclusion drawn and basis for the	RFA/RFP FCDP Policies Interview TEGL 8-17 NFJP Program guidance Employ Florida (EF)	

conclusion. The complainant must be informed in writing of the final decision and resolution of the complaint. • Appeal rights and procedures. The notice of final resolution must provide complete information on the process and timeframe for the complainant to appeal the decision if they disagree with it. 3. Does the project recipient have a process to provide information on these procedures to participants and other interested or affected parties, including One-Stop partners and service providers? 4. Does the project recipient ensure that the information is understood by affected individuals including youth and those whose spoken English is limited? 5. The review of recent complaints and /or grievances were resolved in a timely manner and consistent with policy and/or state policy? 6. Does the policy and procedures provide for an opportunity for informal resolution and hearing to be completed within 60 days of date of filing? Did the grant recipient adhere to the 120 days deadline for appeals?		

(C) Indicator 2.i.5: Incident Reporting
The project recipient has a formal procedure in place for timely submission of incident reports.
Citations
TEGL 2-12 and CFR 683.620, CFR 200.331(a)(5), CFR 200.333, CFR 200.343 and CFR 2900.15
Florida Department of Education (FDOE) Farmworker Career Development Program (FCDP) RFP/RFA

Provider Review Protocol NFJP-FCDP Questions	Methods of Collection/ Examples of Documentary Evidence	Notes
1. The Uniform Guidance establishes a mandatory disclosure requirement for grant recipients and sub-recipients to disclose in writing to the federal awarding agency or pass-through entity violations of federal criminal law involving fraud, bribery or gratuity violations that potentially affect the federal award. Incidents, on the other hand, involve actions that may be criminal in	RFA/RFP FCDP Policies Interview TEGL 8-17 NFJP Program guidance Employ Florida (EF)	

nature or at least there are suspicions that criminal activity is occurring. Incidents are events involving: • Fraud, misfeasance, nonfeasance or malfeasance • Misapplication of funds • Gross mismanagement • Employee or participant misconduct • Waste and program abuse • Other criminal activities • TEGL 2-12 describes fraud and the various "feasances" (misfeasance, nonfeasance and malfeasance) as follows: Any alleged deliberate act which may violate federal statutes or regulations. It includes but is not limited to bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks from participants or contractors, intentional payments to a contractor without the expectation of receiving services, payments to ghost enrollees, misuse of appropriated funds and misrepresenting information in official reports. • Is the sub-recipient aware of any incident described above and were these allegations immediately reported according with the memo Complying with Fair Treatment Policy Complaint Procedures and Incidence Reporting Requirements incident reporting/system?		

TOOL NFJP-2 – FILE REVIEW WORKSHEET

Instructions:

❑ Use this worksheet to facilitate file review required for Indicator 1.e.3: Eligibility/Enrollment and Indicator 1.e.4: Assessment.

❑ Use the comments field to document concerns related to services provided or not provided and whether the file is compliant with the sub-recipient's established policies.

❑ This document also contains a reference guide of applicable definitions and citations.

❑ The "Reviewer's Eligibility Determination" field should be used to record whether the documents in the file evidence that the subject individual was eligible for NFJP services at the time of enrollment. The reviewer's determination of eligibility should be based on objective review of the file documents.

Note on Sample Size and File Review Instrument:

❑ Review as many files as practicable to get a reasonable understanding of sub-recipient practices and identify patterns. Due to the varying size of NFJP grants, appropriate sample size may differ between sub-recipients. For example, it may be practicable to review 100 percent of a grant that has 30 files but only 10 percent of a grant that has 300 files. Appropriate sample size should be determined by the Reviewer and should be sufficient to establish whether positive or negative patterns exist.

❑ Print/use as many pages as needed for the particular review.

❑ Review the sub-recipient's annual data validation by sampling the data validation sample, which the sub-recipient provided them.

❑ For file review worksheets on key performance aspects to review, reviewers should utilize the Wagner-Peyser Employment Services (WP/ES) and title I Adult/Youth file review tools included in this Core Monitoring Guide.

Farmworker Career Development Program
PY 23-24

# of File Reviewed	Participant Name/Identifier	Does the File Contain Clear Documentation of											Reviewer Eligibility Determination
							If Qualifying as Dependent						
		Farmworker Status	Low-Income Status	Age	Proper Eligibility Determination Period Applied	Veteran or Eligible Spouse of Veteran	Does the individual used to qualify meet all eligibility requirements?	Does the individual to be enrolled meet the definition of dependent?	Self-Certification	Staff Determination	Enrollment Date	Participant or Reportable Individual Status	
Worksheets A, B and C in File		☐ Yes ☐ No	☐ Yes ☐ No	☐ Adult ☐ Youth	☐ Yes ☐ No	☐ Yes No / Selective Serv. Reg. ☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
	Services Provided: ☐ Career Services ☐ Training Services ☐ Youth Services ☐ Related Assistance												
	Comments:												
Worksheets A, B and C in File		☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No ☐ Adult ☐ Youth	☐ Yes ☐ No	☐ Yes ☐ No / Selective Serv. Reg. ☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
	Services Provided: ☐ Career Services ☐ Training Services ☐ Youth Services ☐ Related Assistance												
	Comments:												

Worksheets A, B and C in File												
Worksheets A, B and C in File	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No ☐Adult ☐Youth	☐Yes ☐No	☐Yes ☐No Selective Serv. Reg. ☐Yes ☐No ☐N/A	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No

Services Provided:☐ Career Services   ☐ Training Services   ☐ Youth Services   ☐ Related Assistance

Comments:

Worksheets A, B and C in File	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No ☐Adult ☐Youth	☐Yes ☐No	☐Yes ☐No Selective Serv. Reg. ☐Yes ☐No ☐N/A	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No

Services Provided:☐ Career Services   ☐ Training Services   ☐ Youth Services   ☐ Related Assistance

Comments:

Worksheets A, B and C in File	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No ☐Adult ☐Youth	☐Yes ☐No	☐Yes ☐No Selective Serv. Reg. ☐Yes ☐No ☐N/A	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No

Services Provided:☐ Career Services   ☐ Training Services   ☐ Youth Services   ☐ Related Assistance

Comments:

C/E	Yes	No	
C	☐	☐	**Do all files comply with the sub-recipient's own policies and procedures for recordkeeping and the federal records retention policy?** Sub-recipients may establish their own policies and procedures, which may create requirements beyond ETA's standards. In those cases, the sub-recipient must comply with their own policies and procedures in addition to ETA's requirements. If the sub-recipient has established additional internal controls for files and complies with its higher standards, the reviewer may note a best practice. *Example: Sub-recipient established a checklist of documents that must be in each participant file. In that case, all participant files must comply with the checklist.*
C/E	☐	☐	**If the sub-recipient's policy includes administering assessments (e.g., Initial assessments) do files contain assessment documentation and related plans?** See Indicator 1.e.4: Assessment.
C/E	☐	☐	**Do files include documentation of appropriate service plans (e.g., Individual Employment Plans) and include an appropriate combination of services? Is there evidence that the plans are revisited periodically to reflect progress and to address any items that might have changed over time?** See Indicator 1.e.5: Participant Service Plan.
C	☐	☐	**Do files evidence compliance with requirements to safeguard protected personally identifiable information (PII) and other information that is deemed sensitive or confidential according to applicable privacy laws and obligations of confidentiality?**
C/E	☐	☐	See Objective 2.g: Records Management, 2 CFR 200.303, 2 CFR 200.337, TEGL 39-11 and Grant Terms and Conditions. **Do case notes evidence referrals to appropriate One-Stop partners, as applicable, including but not limited to, Wagner-Peyser Employment Services, supportive service providers, WIOA programs and the SWA Employment Service and Employment-Related Law Complaint System?** Complaints: If participant files contain information that appears to violate an employment-related law or Employment Service regulation, it may be appropriate to inform the participant of the Employment Service and Employment-Related Law Complaint System and/or refer the individual to the state workforce agency/state monitor advocate for assistance. *Example: Case notes indicate low-income status and lack of employment documentation is allegedly due to prior employer(s) not paying appropriate wages or providing paystubs. Reviewer should look for documentation that information on complaints was provided and/or referral to SWA/SMA.* See Indicator 1.e.6: Supportive Services.

Comments:

Instructions

Using the tables below, document sub-recipient targets for performance and individuals served, as stated in the most recently approved program plan. Obtain actual current levels for each measure/target and compare to determine whether the sub-recipient is on track to meet overall performance for the program year.   Use in conjunction with Indicator 2.e.1: Performance Reporting.   Additional information on WIOA Performance Indicators is available at https://www.dol.gov/agencies/eta/performance/performance-indicators.

NFJP:

PY:

Quarter:

Career Services and Training		
Program Year Performance	Target	Actual
# Reportable Individuals served in this Program Year Note: Although performance calculations are based on outcomes for participants, grantees may serve reportable individuals and may include this information in their program plan. Reviewers are encouraged to use this information to gain a better understanding of a sub-recipient 's overall program service delivery approach.)		
Is the grantee on track to meet targets?	Yes	No

Adult		PY 2025-2026		
		Plan	Actual	%
A1	New Participants			
B1	Entered Employment			
B3	Number Participants Exiting			
B4	Attained a Credential			
B5	Measurable Skill Gains			
C2	Training Services			
	Apprenticeships			
	Reportable Individual			
	Total Participants			

Youth		PY 2025-2026		
		Plan	Actual	%
A1	New Participants			
B1	Entered Employment			
B3	Number Participants Exiting			
B4	Attained a Credential			
B5	Measurable Skill Gains			
C2	Training Services			
	Apprenticeships			
	Reportable Individual			
	Total Participants			

Abbreviations

Agricultural Outreach Plan – AOP

American Job Center – AJC

Balance Performance – BP

Compliance indicator – C

Core Monitoring Guide – CMG

Coronavirus Aid, Relief and Economic Security Act – CARES Act

Effectiveness indicator – E

Employment and Training Administration – ETA

Employment and Training Order – ETO

Farmworker Career Development Program – FCDP

Florida Department of Education – FDOE

Funding Opportunity Announcement – FOA

Memoranda of Understanding – MOU

Migrant and Seasonal Farmworkers – MSFW

Project Improvement Plan – PIP

Remote Monitoring or Enhanced Desk Monitoring Review – EDMR

Request for Application – RFA

Request for Proposal – RFP

State Monitor Advocates – SMA

State Workforce Agency – SWA

The National Farmworker Jobs Program – NFJP

Training and Employment Guidance Letter – TEGL

Workforce Innovation and Opportunity Act – WIOA

Fiscal Monitoring Work File

Request for Fiscal Documentation:
Fiscal request included the following documentation:
- ☐ Allowable Cost Protocol to be signed by finance and returned
- ☐ Current Organizational Chart that includes FCDP or department FCDP functions under
- ☐ DOE 599 Project Disbursement Report (599) for specified month
- ☐ Copy of FLAGS drawdown for same specified month as 599
- ☐ Internal ledgers for the disbursements reported in the specified 599
- ☐ Time sheets or copy of process verifying employee compensation for specified month
- ☐ Supporting documents for each charge reported to specified month of 599
- ☐ Supportive Services documentation for each payment reported in the specified month of 599
- ☐ Travel documents for each travel charged to specified month of 599

Fiscal Monitoring Review:

NFJP-Core Monitoring Guide-Supplement, **Monitoring Guide Core Activity Indicators:**
- ☐ Indicator 1.b.1: Designating Personnel, Staff and Hiring
- ☐ Indicator 1.b.6: Timely Equipment Purchases
- ☐ Indicator 2.a.1: Specific Award Conditions
- ☐ Indicator 2.a.2: Prior Approval of Project Modifications
- ☐ Indicator 2.a.3: Closeout Requirements
- ☐ Indicator 2.b.1: Budget Controls
- ☐ Indicator 2.c.1: Insurance Coverage
- ☐ Indicator 2.c.3: Equipment/Property/Inventory
- ☐ Indicator 2.c.4: Rental or Leasing Costs for Property
- ☐ Indicator 2.c.5: Supplies
- ☐ Indicator 2.d.1: Procurement Standards
- ☐ Indicator 2.d.2: Competition
- ☐ Indicator 2.d.3: Methods of Procurement
- ☐ Indicator 2.d.4: Cost or Price Analysis
- ☐ Indicator 2.d.5: Contract Administration
- ☐ Indicator 2.g.1: Record Retention
- ☐ Indicator 2.g.2: Accessibility
- ☐ Indicator 2.g.3: Protected Personal Identifiable Information
- ☐ Indicator 2.g.4: Custody and Transfer
- ☐ Indicator 2.h.1: Personnel Policies and Procedures
- ☐ Indicator 2.h.2: Staff Positions
- ☐ Indicator 2.h.3: Staff Salaries
- ☐ Indicator 2.h.4: Organizational Chart
- ☐ Indicator 3.a.1: Effectiveness and Efficiency of Operations
- ☐ Indicator 3.a.3: Compliance with Applicable Laws and Regulations
- ☐ Indicator 3.a.4: Safeguard on Assets
- ☐ Indicator 3.b.1: Basis of Reporting
- ☐ Indicator 3.b.3: Recipient's Financial Reporting
- ☐ Indicator 3.b.4: Performance Reports
- ☐ Indicator 3.c.1: Cash Disbursements
- ☐ Indicator 3.c.2: Improper Payments

- ☐ Indicator 3.c.3: Deposit Insurance
- ☐ Indicator 3.f.1: Cost Principles
- ☐ Indicator 3.f.2: Financial Management Systems
- ☐ Indicator 3.g.1: Cost Allocation Principles
- ☐ Indicator 3.g.2: Cost Allocation Plans
- ☐ Indicator 3.h.2: Sub-Recipient's Audit

Core Activity 1: Service Design & Delivery
For Core Activity 1 only, the Reviewer will be required to make a determination on whether an indicator is either compliance (C), Effective (E) or both and identify the appropriate citation applicable to the indicator.

Objective 1.b: Implementation

The project recipient has implemented service design and delivery activities in order to accomplish all project activities and goals.

(C) Indicator 1.b.1: Designating Personnel, Staff and Hiring
The project recipient has the necessary staff to successfully conduct its administrative and operational duties under the project.
Citation
Project Awards
FDOE Policies
RFA/RFP, Attachment H, Staffing Parameters, Position Descriptions and Personnel Selection and Personnel Related Changes

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Has the project recipient hired additional staff for this project consistent with the project/budget? • If so, Is the State Director's approval on file? • Was a new Staffing Breakout Form received within 10 days of the change?		
2. If the project recipient has not hired additional staff, will the staff assigned to this project have sufficient time to work on this project and perform their normal duties as well? • Does the Coordinator work at least 50% leading the program site?	Project Award Staffing Breakout Form Interview	
3. What training has staff received to ensure they have the skills and experience necessary to perform their assignments? • Did all job descriptions include the required knowledge, skills and abilities for positions supporting the project?	Job Descriptions Resumes for new staff	
4. If the project recipient has not hired staff, has this led to Or, will it impact performance if not resolved?		

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
5. Do hired staff have the training and skills to ensure the needs of individuals with disabilities are properly addressed?		
6. If the project recipient has not hired staff as indicated in the Staffing Breakout Form, what is impeding its progress to hire necessary staff?	Staffing Breakout Form Interview	
7. Does the project recipient's actual staffing pattern agree with the staffing chart that is included in their application's project for the most recent funding opportunity announcement or annual program plan?	Project Award Budget Staffing Breakout Form RFP Staffing Pattern	
8. If the project recipient's staffing plan is different: • How is it different? • Is the project recipient adequately staffed to provide all services mentioned in the project throughout the entire service area? • Has the project recipient been providing services throughout the entire service area? If not, why?	Project Award Staffing Breakout Form	

(E) Indicator 1.b.6: Timely Equipment Purchases
The project recipient has purchased equipment outlined in the SOW or requested approval to purchase equipment subsequent to the project award.
Citations:
200.439 and 2900
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Projected Equipment Purchases Form, Attachment H, Amendments

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. What equipment or services if any, did the project recipient specify they would procure?	Project Award Budget Projected Equipment Purchases Form	
2. When must the equipment or service be purchased and in place to fully support the work outlined in the project?	Recipient Policies and Procedures	
3. If the project recipient is behind in the purchasing of equipment or services, how will the delay impact the overall implementation and outcome success of the project?	Award Project Award Budget	
4. What can the project recipient do to ensure all equipment and services purchased are in place to support successful execution of all project activities?	Project Award Budget	

Core Activity 2: Project Management

Objective 2.a: Project Management
The project recipient has an adequate system in place to manage the project, including any specific award conditions, project modifications and closeout requirements.

(C) Indicator 2.a.1: Specific Award Conditions
The project recipient has award conditions that may include an industry focus, occupational targets, certain populations to be served and allowable project activities specified by FDOE upon which it must adhere to.
200.208

FDOE Policies
Sub-Recipient Project Award/RFA/RFP, Attachment H

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. There are terms and special conditions placed on the award by the FDOE/FCDP. How is the project recipient adhering to and satisfying the fiscal management requirements listed in Attachment H of the RFP/RFA? • Project Amendments • Electronic Budget and Monthly Disbursement Reports • Closeout • Property Standards • Record Retention • Travel	Project Award DOE 599 Monthly Disbursement Reports (599) Amendments Out-of-State Travel Authorizations FCDP-Inventory	
2. If the project recipient is not meeting one or more specific award conditions of the project, what steps or procedures does it have in place to correct/remedy the situation?	Interview	

(C) Indicator 2.a.2: Prior Approval of Project Modifications-
The project recipient is aware of the amendment process that requires prior written approval from the awarding agency Florida Department of Education (FDOE) for certain changes to the project or budget. The process installed by the project recipient ensures that prior written approval is obtained in a timely manner.
Citations
CFR 200.308 and CFR 200.407
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Amendments
Green Book Section B - Project Amendments

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have policies and procedures in place when an amendment is needed?	Recipients Policies and Procedures	
2. How does the project recipient ensure that there are no changes in the scope or the objective of the project or program without FDOE prior written approval?	Recipients Policies and Procedures	
3. Are project management staff aware of amendments that require prior approval? Are they also aware of their award specific requirements related to the FDOE amendment policy?	Amendments	
4. Has the project recipient made any changes to the approved budget without prior approval? • If so, have they been notified that such change is not recognized by the FDOE?	Amendments Project Award Budget 599 Supporting Documents	
5. Has the project recipient complied with the prior approval requirements of the award in relation to non-budget related amendment prior approvals (e.g., change in key person, etc.)?	Staffing Breakout Forms Amendment	
6. Did the project recipient receive amendment approval prior to the action taken or cost incurred?	Amendments 599 Supporting Documents	

(C) Indicator 2.a.3: Closeout Requirements
The project recipient has a process in place for timely completion of closeout of its project.
Citation
CFR 200.344
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H , Closeout
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have a procedure in place to assure timely submission of required closeout documentation within 90 calendar days of the end of the project period of performance?	Project Award Timelines Recipient Policies and Procedures State Office Project Closeout Desk Top Review	
2. Does the project recipient have a procedure in place to accurately accrue costs at the end of the period of performance and liquidate those accruals during the 90-day closeout period? How does the project recipient ensure and	Recipient Policies and Procedures Final 599	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
accurately reports accrued costs on the final DOE 599 Project Disbursement Report and liquidates those accruals prior to submitting the final FDOE 599 Project Disbursement Report?	State Office Project Closeout Desk Top Review	
3. Are project recipients aware of and compliant with records access and retention requirements of the project?	Recipient's Policies and Procedures	

Objective 2.b: Budget

The project recipient has a financial management system or budget control mechanism in place to monitor spending, determine allowability of costs, compare and reconcile the budget to actual expenditures. The system also has triggers for budget amendments when deemed necessary.

(C) Indicator 2.b.1: Budget Controls
The project recipient has an approved budget that is compared to actual expenditures to ensure that funds are obligated and spent within the authorized period of performance.
Citations

CFR 200.302(b)(5) and CFR 200.308
FDOE Policies
Sub-Recipient Project Award/RFA/RFP, Attachment H, Amendments

Green Book Section B - Project Amendments

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. How does the project recipient know when a budget amendment is required?	Recipient's Policies and Procedures 599's Quarterly Desk Top Reviews	
2. Are managers and program staff regularly informed of changes in the budget or given routine updates comparing budgeted items to actual costs?	Recipient's Policies and Procedures Quarterly Desk Top Reviews	
3. Does the project recipient have a process to review budget versus actual expenditures?	Recipient's Policies and Procedures USDOL Tool E	
4. What is the frequency of the organization performing a budget-to-actual expenditure analysis?	Recipient's Policies and Procedures 599's (Monthly)	

	Administrative Costs	Staff Cost	Related Assistance	Supportive Services	Other Program Costs	TOTALS
Year _						
% Budgeted						
% Expended						
Year _						
% Budgeted						
% Expended						

Objective 2.c: Property Management

The project recipient maintains a property management system in accordance with all prior approval requirements, terms and conditions of the award and written programmatic policies and procedures.

(C) Indicator 2.c.1: Insurance Coverage

The project recipient has at least the minimum equivalent insurance coverage for real property and/or equipment acquired or improved with grant funds.

Citation

CFR 200.310

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Property Standards

Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have minimum insurance coverage for equipment/inventory acquired with project funds?	Recipient's Policies and Procedures	

(C) Indicator 2.c.3: Equipment

The project recipient has policies and procedures in place for the acquisition, management and disposition of equipment purchased with project funds.

Citation

CFR 200.313

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Property Standards and Projected Equipment Purchases Form

Green Book Section C - Fiscal and Program Accountability

Reference Guide for State Expenditures, Pages 43 and 81

REFERENCE GUIDE FOR STATE EXPENDITURES

Notes:
- USDOL threshold for equipment is $5,000
- Sub-recipients and FDOE threshold for equipment is $1,000

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. For equipment purchased with project funds, was prior approval received prior to the acquisition or disposition of that equipment?	Projected Equipment Purchase Forms (if items are over threshold) Project Award Amendments (if applicable)	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
2. Does the project recipient have policies and procedures governing the acquisition, management and disposition of equipment?	Recipient's Policies and Procedures FCDP-Funded Inventory List	
3. Is the project-funded equipment currently in use for the authorized purposes of the project that it was acquired for?	Recipient's Policies and Procedures Interview FCDP-Funded Inventory List	
4. Are equipment records maintained with the required data elements? • Description of equipment • Serial number • Acquisition cost and date • Percentage of Federal participation in the purchase • Titleholder • Current use, condition and location • Disposition information • Project Number • Sales price and date of disposition	FCDP-Funded inventory list	
5. Is a physical inventory of the equipment carried out and is it reconciled with the property records at least once every two years?	Recipient's Policies and Procedures Interview or documentation of last official inventory date	
6. Is an adequate control system in place to prevent loss, damage or theft of the equipment?	Recipient's Policies and Procedures	
7. Is the equipment maintained in good condition with adequate maintenance procedures?	Recipient's Policies and Procedures FDCP-Funded Inventory List	
8. Does the project recipient have a system in place for disposition of equipment?	Recipient's Policies and Procedures FCDP-Funded Inventory List	
9. Can the project recipient attest or confirm that it has made efforts where required or applicable to Buy American products or goods?	Interview Purchasing Documentation	

(C) Indicator 2.c.4: Rental or Leasing Costs for Property
The project recipient has determined whether rental costs for real property and equipment are reasonable.
Citation
CFR 200.465
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Cost Standards
Green Book Section C - Fiscal and Program Accountability
Reference Guide for State Expenditures
REFERENCE GUIDE FOR STATE EXPENDITURES

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Do agreements have a schedule of payments and is each signed by the program signatory that is authorized to sign on behalf of the organization?	Leases/Contracts/Rental Agreements	
2. If equipment was purchased or leased, did the project recipient make a determination of the best option (leased or purchased)? Was a cost and/or price analysis performed to determine if the project recipient selected the best option?	Recipient's Policies and Procedures Cost Analysis	
3. Are rental agreements reviewed periodically to determine if circumstances have changed and other options are available?	Recipient's Policies and Procedures Leases/Contracts/Rental Agreements	
4. Look at the lease terms. Are any lease terms beyond the project's period of performance? If so, does the project recipient have plans to cover the lease's rental payments with non-project dollars?	Leases/Contracts/Rental Agreements	
5. If the project recipient has idle facilities or idle capacity that is being charged to the project, is it: • Necessary to meet workload requirements or • Necessary when initially acquired and is not idle because of changes in the program requirements or other causes which could not have been reasonably foreseen? Note: If not meeting criteria outlined above, costs related to idle facilities or idle capacity would be unallowable to project funds.	Recipient's Policies and Procedures Leases/Contracts/Rental Agreements	
6. If idle facilities or idle capacity is allowable, are costs allowable for a reasonable period of time (ordinarily not to exceed one year) and are normal costs of doing business?	Recipient's Policies and Procedures Leases/Contracts/Rental Agreements	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
Note: These costs could be charged as direct or indirect costs to a project.		

(C) Indicator 2.c.5: Supplies

The project recipient has policies and procedures in place to manage the use of supplies acquired with project funds.

Citation

CFR 200.314

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Property Standards

Green Book Section C - Fiscal and Program Accountability C-18

Notes:
- USDOL threshold for equipment is $5,000
- Sub-Recipients and FDOE threshold for equipment is $1,000

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have policies and procedures covering supplies?	Recipient's Policies and Procedures	
2. Does the project recipient need prior approval for purchasing supplies?	Recipient's Policies and Procedures Project Award Budget Amendments (if applicable)	
3. What procedure does the project recipient have in place to recognize and differentiate when supplies and equipment is purchased with project funds?	Recipient's Policies and Procedures	

Objective 2.d: Procurement and Contract Administration

The project recipient maintains an adequate procurement/purchasing system that includes written procedures and ensures that all contracting or procurement actions are performed in a manner that provides for full and open competition.

(C) Indicator 2.d.1: Procurement Standards

Sub-recipients follow the same policies and procedures that they use for procurement with non-federal funds. For all other project recipients, the documented policies and procedures conform to applicable federal laws and the procurement standards identified in the Uniform Guidance.

Citations

CFR 200.113, CFR 200.317, CFR 200.318, CFR 200.319, CFR 200.320, CFR 200.321, CFR 200.322, CFR 200.323, CFR 200.324, CFR 200.325 and CFR 200.326

FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Cost Standards
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient conduct procurement activities in a manner that promotes full and open competition and is not restrictive of competition?	Recipient's Policies and Procedures Supporting Documentation	
2. Is there a separate procurement/purchasing policy on the following? • Micro-purchases • Small purchases • Sealed bids/formal advertising • Procurement by competitive proposals • Non-competitive purchases (sole source) • Professional and/or qualifications-based services	Recipient's Policies and Procedures	
3. Does the project recipient maintain oversight to ensure that contractors perform in accordance with the terms, conditions and specifications of their contracts or purchase orders?	Recipient's Policies and Procedures Interview	
4. Does the project recipient maintain a written code of conduct covering conflicts of interest and governing the actions of its employees or board members engaged in the selection, award and administration of contracts?	Recipient's Policies and Procedures for Purchasing Conflicts of Interest	
5. Does it include signed and written "Conflict of Interest" statements?	Recipient's Policies and Procedures	
6. Is the project recipient ensuring that applicants or entities submitting bids and/or proposals are disclosing, in a timely manner, in writing to the FDOE all violations of federal criminal law involving fraud, bribery or gratuity violations potentially affecting the project award?	Recipient's Policies and Procedures Supportive Documentation (if applicable)	
7. Does the project recipient take affirmative steps to assure that minority businesses, women's business enterprises and labor surplus area firms are used when possible?	Recipient's Policies and Procedures	
8. When issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded as a whole or in part with Federal money, does the project recipient clearly state the following? • The percentage of the total costs of the program or project which will be financed with federal money	Recipient's Policies and Procedures	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
• The dollar amount of federal funds for the project or program • The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.		

(C) Indicator 2.d.2: Competition

The project recipient performs all procurement transactions in a manner providing full and open competition.

Citation

CFR 200.319

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Cost Standards

Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. What is the project recipient's process for procurement activities?	Recipient's Policies and Procedures 599 Supporting Documentation Interview	
2. Does the project recipient ensure that it conducts procurement activities in a manner to ensure full and open competition and is not restrictive of competition as listed on CFR 200.319(a)(1-7): • Placing unreasonable requirements • Requiring unnecessary experience and excessive bonding • Noncompetitive pricing practices • Noncompetitive contracts to consultants • Organizational conflicts of interest • Specifying only a "brand name" product instead of allowing "an equal" product to be offered • Any arbitrary action on the procurement process	Recipient's Policies and Procedures 599 Supporting Documentation	
3. Does the project recipient have noncompetitive procurement (sole source) procedures? Do these procedures conform to the Uniform Guidance at CFR 200.320?	Recipient's Policies and Procedure 599 Supporting Documentation	
4. For noncompetitive procurement (sole source), are noncompetitive procurement determinations appropriately	Recipient's Policies and Procedures	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
documented? Does one or more of the circumstances outlined CFR 200.320 (c)(1-5): apply? • The item is available only from a single source • The public exigency or emergency for the requirement does not permit a delay resulting from competitive solicitation • After solicitation of a number of sources, competition is determined inadequate		

(C) Indicator 2.d.3: Methods of Procurement
The project recipient uses a method of procurement as prescribed in the Uniform Guidance.
Citation
CFR 200.320
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Cost Standards
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. For the purchase of goods and/or services, did the project recipient appropriately use one of the procurement methods outlined above?	Recipient's Policies and Procedures Purchasing Documentation	
2. Does the procurement history file demonstrate that it used one of the procurement methods outlined above?	Recipient's Policies and Procedures Purchasing Documentation	
3. Does the file contain enough evidence to support full and open competition?	Recipient's Policies and Procedures Supporting Purchasing Documentation (if applicable)	

(C) Indicator 2.d.4: Cost or Price Analysis
The project recipient performs a cost or price analysis on all procurement actions in excess of their acquisition threshold, including contract modifications. The method and degrees of analysis are dependent on the procurement situation, but the project recipient must make independent estimates prior to receiving bids or proposals.
Citation
CFR 200.324
FDOE Policies
Sub-Recipient Project Award/RFA, Attachment E, Fiscal Management, Cost Standards
Green Book Section C - Fiscal and Program Accountability

REFERENCE GUIDE FOR STATE EXPENDITURES

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. From the selection of contracts obtained in the previous indicator, did the project recipient use a cost/price analysis for contracts in excess of their threshold? How does the project recipient use cost/price analysis?	Recipient's Policies and Procedures Contracts Review (if applicable)	
2. Is the determination appropriate to the nature of the agreement (e.g., fixed-price, performance-based, cost reimbursement, etc.)?	Contracts Review (if applicable)	
3. Are the amounts paid consistent with the terms of the agreement?	Contracts Review (if applicable)	
4. For performance-based contracts, are the levels of performance reasonable for the level of payment? Are performance levels specified and negotiated in the contract met before payment is made?	Project Award Contracts Review (if applicable)	

(C) Indicator 2.d.5: Contract Administration
The project recipient maintains a system for contracts administration. All contracts must contain the applicable provisions described in Title 2(A)(II)(200) Contract Provisions for Non-Federal Entity Contracts Under Federal Awards.
Citation
CFR 200.326
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Cost Standards
Green Book Section C - Fiscal and Program Accountability
Reference Guide for State Expenditures
REFERENCE GUIDE FOR STATE EXPENDITURES

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient make available upon request, for the FDOE pre-procurement review, procurement documents, such as requests for proposals or invitations for bids or independent cost estimates?	Contracts/CareerSource Agreements Purchasing Documents (if applicable) Interview	
2. Are the individual(s) responsible for signing agreement-authorized individuals to properly enter into contracts on behalf of the project recipient? Are the signatory(ies) authorized to sign on behalf of the organization?	Contracts/CareerSource Agreements	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
	Purchasing Documents (if applicable)	
3. How does the project recipient administer contracts and confirm the terms and conditions of the contract are being met?	Recipient's Policies and Procedures Contracts/CareerSource Agreements	
4. Does the project recipient have a process for the closeout of contracts? Do the contract closeout policies and procedures address the following: • Final payment? • Final deliverable of good and/or service?	Recipient's Policies and Procedures	
5. Examine contracts and confirm that they contain the essential elements of a legally executed and binding written agreement as specified in contract law, which must contain at a minimum the following in writing: • Offer • Acceptance • Consideration • Authorized purpose • Authorized officials	Contracts/Agreements	
6. The contract should include a specified SOW that outlines the goods or services being rendered in consideration or specified payments. The contract should specify the period of performance or the start and end date of the contract and the total amount of the contract should also be specified. Review the contract for the following: • Authorized Officials and Purpose. Authorized officials are persons authorized to enter into and sign legally binding agreements and must be on record as the signatory official. Signatures of both parties to the contract must be evident and part of the written contract. • Additional contractual terms and conditions. Contracts must include such standard terms and conditions that are required by the federal agency as national, state or local policy requirements. Please refer to the terms in the grant agreement and Appendix II to 2 CFR Part 200.	Project Award Contracts/Agreements	
7. How does the project recipient maintain records sufficient to detail the history of the procurement? Include: • Rationale for the method of procurement • Selection of contract type	Contracts/Agreements	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
• Basis for contractor selection or rejection • Basis for contract price		

Objective 2.g: Records Management

The project recipient maintains a system and implements procedures to manage and secure all financial records, supporting documents, statistical records and all other records pertinent to the federal award.

(C) Indicator 2.g.1: Record Retention
The project recipient has an appropriate policy and procedure for the retention of records pertinent to the federal and state award that meets the requirements of applicable federal laws, regulations or project agreement purposes.
Citation
CFR 200.334
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Record Retention
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Has the project recipient properly identified all financial records, supporting documents, statistical records and all other records pertinent to the project award that must be retained?	Recipient's Policies and Procedures	
2. Does the project recipient have record retention policies that meet the requirements of applicable Federal laws and regulations?	Recipient's Policies and Procedures	
3. Has a record retention schedule been established for the project records with appropriate dates when records are no longer subject to retention?	Recipient's Policies and Procedures	
4. Does the project recipient have a designated staff person with custodian of record duties?	Recipient's Policies and Procedures Interview	
5. If records are in an electronic medium, is the medium likely to be outdated in three years and not accessible?	Recipient's Policies and Procedures	

(C) Indicator 2.g.2: Accessibility
The project recipient must maintain accessible records for the purposes of audits, examinations, excerpts and transcripts. This includes making personnel available for interviews and discussions related to project records.
Citation
CFR 200.336

FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management General; Audits
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Are project records accessible and available for timely review by authorized officials and representatives?	Recipient's Policies and Procedures	
2. Are personnel responsible for the creation, maintenance and retention of records available for interview upon request?	Recipient's Policies and Procedures	

(C) Indicator 2.g.3: Protected Personally Identifiable Information (PII)
The project recipient takes reasonable measures to safeguard protected PII and other information that is deemed sensitive or confidential according to applicable privacy laws and obligations of confidentiality.
Citations

CFR 200.303, CFR 200.337 and TEGL 39-11
FDOE Policies
Sub-Recipient Project Award/ RFP/RFA, Attachment H, General
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have reasonable internal controls in place and in effect to safeguard protected PII consistent with the requirements of the project award?	Recipient's Policies and Procedures	
2. Does the project recipient appropriately secure sensitive and confidential information collected and retained for the purposes of the grant award, including restricted access limited to necessary personnel?	Recipient's Policies and Procedures	

(C) Indicator 2.g.4: Custody and Transfer
The project recipient's record retention policy has safeguards to ensure the maintenance and custody of project records under various circumstances.
Citations

CFR 200.334 and CFR 2900.18
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Record Retention
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the record retention requirement address circumstances under which custody of the records should be transferred to the project recipient?	Recipient's Policies and Procedures	
2. Is there a disaster plan in place to ensure that records are adequately safeguarded in a time of a disaster? Are there back-up files?	Recipient's Policies and Procedures	
3. Does the project recipient have procedures in place to set aside grant project funds for record retention activities subsequent to the project's period of performance?	Recipient's Policies and Procedures	

Objective 2.g: Personnel

The project recipient's management and staffing are aligned with the project plan and designed to assure responsible and ethical management of the project.

(C) Indicator 2.h.1: Personnel Policy and Procedures
The project recipient has a current written personnel policy (including the hiring process and procedures) that meets the requirements of applicable federal laws and regulations on file and enforces it.
Citation
200.430(a)(1)(2)
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Staffing Parameters, Position Descriptions and Personnel Selection, Personnel Related Changes, Attachment D, Staffing Breakout Form

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Are the policies and practices reasonable for the services rendered and do they conform to the established written policy of the project recipient consistently applied to both federal and non-federal activities?	Staffing Breakout Form Award Budget Narrative Recipient's Policies and Procedures	
2. Do policies and practices appear to be reasonable and in compliance with applicable local, state and federal laws and regulations governing employment?	Recipient's Policies and Procedures	
3. Do records indicate that hiring procedures were conducted according to the project recipient's personnel policy?	Recipient's Policies and Procedures Staffing Breakout Form Job Descriptions Resumes for new staff	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
	Director's approval for new staff	
4. Are the policy and practices reasonable for the services rendered and conforms to the established written policy of the project recipient consistently applied to both federal and non-federal activities?	Recipient's Policies and Procedures	
5. Does the "Equal Opportunity (EO) Is the Law" notice provide contact information for the project recipient's EO officers, an overview of the discrimination complaint process and how complaints may be filed?	Recipient's Policies and Procedures	
6. Does the project recipient have a plan to enhance staff skills and operations?	Recipient's Policies and Procedures	

(C) Indicator 2.h.2: Staff Positions

The project recipient staff positions with responsible individuals.

Citations

CFR 200.113, CFR 200.427, CFR 683.620 and TEGL 02-12

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Position Descriptions and Personnel Selection

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Are positions currently filled with responsible individuals?	Recipient's Policies and Procedures Job Descriptions Resumes for new staff	
2. Review the project's insurance policy. Are appropriate project staff properly insured and bonded? If not, is the project recipient conducting background or qualification checks (e.g., past employment records, criminal activity)?	Recipient's Policies and Procedures	
3. For persons working on the project, has the project recipient confirmed and disclosed in a timely manner, in writing, to the federal awarding agency all violations of federal criminal law involving fraud, bribery or gratuity violations potentially affecting the federal/state award?	Recipient's Policies and Procedures Documentation (if applicable) Interview	

(C) Indicator 2.h.3: Salaries

Salaries and bonuses are reasonable and comparable to the local labor market and within the Executive Level II threshold established by the Office of Personnel Management (OPM).

Citations

CFR 200.430 (b), TEGL 05-06 and OPM Salaries & Wages Schedule

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Staffing Parameters, Personnel Related Changes, Attachment D, Staffing Breakout Form

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Are salaries and fringe benefits reasonable to the extent that they are comparable to those paid for similar work in the same labor market?	Recipient's Policies and Procedures Salary schedules Job Descriptions State Office RFA Staffing Review	
2. Are bonuses, raises, leave practices, etc. covered in written personnel policies?	Recipient's Policies and Procedures Project Award Budget	
3. Is there sufficient documentation to support the salaries and fringe benefits charged to this project?	Job Descriptions Salary Schedules Project Award Budget Narrative	
4. For competitive awardees only, are current project staffing patterns and salaries in accordance with the number of positions and salaries approved in the project agreement? If there are deviations, have they been approved by the Director?	RFP Staffing Patterns Project Award Budget Staffing Breakout Form Director Approval	
5. For funds appropriated under ETA appropriations only, are salaries and bonuses paid from project funds in compliance with the salary and bonus limitation of the Executive Level II ($204,000.) on the federal executive pay scale?	Project Award Budget Staffing Breakout Form	

(E) Indicator 2.h.4: Organizational Chart

Project staff and job descriptions are sufficient to perform project functions and implement the project recipient's Award Summary

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Staffing Parameters, Attachment D, Staffing Breakout Form

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Is the project's organizational chart up to date?	Organizational Chart that includes either FCDP Staff or Coordinator's Supervisor	Documents Request: Current Organizational Chart for FCDP or FCDP Coordinator Supervisor
2. Does the organizational chart present a staffing structure that provides capacity for the key functions?	Organizational Chart	
3. Are there any gaps evident in the project recipient's management and staffing structure?	Organizational Chart Staffing Breakout Form	
4. Review job descriptions for one or two primary staff responsible for performing key project functions. Do the job descriptions delineate responsibilities, duties and required experience, skills and qualifications that clearly describe the expectations and requirements of the positions in order to provide project recipient organization capacity in these key functional areas?	Job Descriptions Project Award Budget Narrative	
5. If the project contains specific staffing requirements, review a written description of the current staffing pattern and compare this information with staffing patterns as described in the project agreement. Are the current project's staffing patterns in accordance with the grant agreement? If there are deviations, how are they being addressed?	Staffing Breakout Form RFP Staffing Patterns Project Award Budget Narrative	

Core Activity 3: Financial Management

Objective 3.a: Internal Controls

Effective control, integrity and accountability are maintained for achievement of the project's objectives in operational effectiveness and efficiency, reliable financial reporting and compliance with laws, regulations and policies.

(C) Indicator 3.a.1: Effectiveness and Efficiency of Operations
The project recipient has adequate internal controls in place for effective and efficient project operations.
Citations
CFR 200.302, CFR 200.303(a) and CFR 200.400
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management

Green Book Section D - General Assurances, Terms and Conditions for Participation in Federal and State Programs D-3

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the recipient employ sound organization and management techniques to assure proper and efficient administration of the award, in recognition of project recipient's own unique combination of staff, facilities and experience?	Recipient's Policies and Procedures Interview	
2. Does the project recipient have internal controls in place to provide reasonable assurance that project operations will achieve the following objectives? • Effectiveness and efficiency of operations • Reliability of reporting for internal and external use • Compliance with applicable laws and regulations	Recipient's Policies and Procedures	
3. Are all required written policies and procedures per the Uniform Guidance in place? Is the recipient establishing a timeframe to review and update policies and procedures on an as-needed basis? • Payments CFR 200.302(b)(6) and CFR 200.305 • Allowable Costs 200.302(b)(7) • Procurement CFR 200.318 • Competition CFR 200.319 • Method for Evaluation and Selection CFR 200.320 • Compensation – Personal Services CFR 200.430 • Compensation – Fringe Benefits CFR 200.431 • Employee Relocation Costs CFR 200.464 • Travel Costs CFR 200.474	Recipient's Policies and Procedures	
4. Do the policies and procedures above reflect proper segregation of duties? Are the duties for the following tasks segregated? • Recording • Custodian • Authorizing • Reconciliation • If not, does the project recipient have alternative controls in place to mitigate the internal control risk?	Recipient's Policies and Procedures	
5. Is there adequate training of project staff? • Is there a monitoring program in place for project operations?	Recipient's Policies and Procedures	
6. Are policies and procedures communicated to all levels of staff?	Recipient's Policies and Procedures	
7. How does management demonstrate a commitment to integrity and ethical values (e.g. annual ethics training, employee handbook, organization mission statement)?	Recipient's Policies and Procedures	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
8. In what ways does the management oversee the project recipient's internal control system and ensure that employees adhere to the standards of conduct?	Recipient's Policies and Procedures Interview	
9. Does management establish an organizational structure, assign responsibility and delegate authority appropriately to achieve the project's objectives?	Staffing Breakout Chart Project/DOE 101S Approved Budget	
10. Does management or human resources (HR) demonstrate a commitment to hire, develop and retain responsible employees?	Recipient's Policies and Procedures	
11. Are conflicts of interest and financial disclosure forms completed by appropriate personnel and updated on a frequent basis?	Recipient's Policies and Procedures	

(C) Indicator 3.a.3: Compliance with Applicable Laws and Regulations
The project recipient has internal controls in place to ensure compliance with applicable laws and regulations governing that program.
Citations
CFR 200.303(a-c) and CFR 688.120
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management
Green Book Section D - General Assurances, Terms and Conditions for Participation in Federal and State Programs D-3

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Has the project recipient updated its policies and procedures to reflect changes and updates contained in the Uniform Guidance (Federal Regulations) WIOA, FDOE and other applicable regulations?	Recipient's Policies and Procedures	
2. What actions or steps does the project recipient take to ensure compliance with applicable laws and regulations governing the program?	Recipient's Policies and Procedures	
3. Does the project recipient evaluate and monitor its compliance with statutes, regulations and the special terms and conditions of the project awards?	Recipient's Policies and Procedures	
4. What training is provided to staff to ensure compliance with regulations and laws?	Recipient's Policies and Procedures	
5. Has the recipient taken reasonable measures to safeguard protected personally identifiable information and other information the federal awarding agency or pass-through entity designates as sensitive or the project recipient	Recipient's Policies and Procedures	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
considers sensitive consistent with applicable federal, state, local and tribal laws regarding privacy and obligations of confidentiality?		

(C) Indicator 3.a.4: Safeguard on Assets

The project recipient has adequate safeguards for all project purchased property and ensures that it is used solely for authorized purposes; has mechanisms in place to prevent unauthorized purchases and disbursements of project funds; and safeguards its assets so not one person controls the order, receipt, payment, reconciliation, management and disposition of an asset.

Citation

CFR 200.302(b)(4)

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Cost Standards

Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have mechanisms in place to prevent unauthorized purchases and disbursement?	Recipient's Policies and Procedures 599 Supporting Documents	
2. Is there proper segregation of duties surrounding the asset management process? Verify that not one individual is responsible for the authorization, receipt, disbursement, access and reconciliation of these assets.	Recipient's Policies and Procedures 599 Supporting Documents	
3. How does the project recipient safeguard physical and intangible assets?	Recipient's Policies and Procedures	
4. Does the project recipient perform an inventory of assets including bus tokens, checks, credit cards, etc.? How are these items safeguarded to prevent unauthorized use? How are these items tracked to ensure proper usage?	Recipient's Policies and Procedures	

Objective 3.b: Accounting System and Financial Reporting

An accounting system is in place that allows the project recipient to maintain accurate and complete disclosure of the project's financial results and those of its sub-recipients.

(C) Indicator 3.b.1: Basis of Reporting

If the project recipient maintains its books of account on a cash basis, it develops and reports accrual data on the financial report.

Citation

CFR 2900.14

FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Electronic Budget and Monthly Disbursement Reports
Green Book Section C - Fiscal and Program Accountability
FLDOE Grants System, FLAGS Agency User

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Is there a policy in place that ensures accounts are reported on an accrual basis?	Recipient's Policies and Procedures 599's	
2. Does the project recipient maintain its books of accounts on a cash or accrual basis? If on a cash basis, is there evidence to support accrual reporting (e.g., MIS reports, spreadsheets, linking documents)?	Recipient's Policies and Procedures 599's Ledgers	
3. Regardless of how the project recipient maintains its books, how does it ensure it captures the costs of all activities that took place in the reporting period?	Recipient's Policies and Procedures 599's Ledgers	
4. If estimates are used to complete the financial report, is there a methodology in place and is it reviewed by the appropriate staff member?	Recipient's Policies and Procedures 599's	

(C) Indicator 3.b.3: Sub-Recipient's Financial Reporting
The Florida Department of Education has a system in place to ensure the sub-recipient is reporting financial results of its project activities on an accrual basis and in a timely manner.
Citation
CFR 200.331(a)(3)
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Electronic Budget and Monthly Disbursement Reports
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. There policies and procedures provided by the FDOE to ensure accurate financial reporting? Are the policies and procedures being adhered to on the following? • Accrual basis of reporting • Reporting instructions	Recipient's Policies and Procedures 599's	

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
• Reporting Formats		
2. If not, what processes are in place to ensure timely and accurate reporting of financial information?	Interview	
3. Is the project recipient submitting timely DOE 599 Project Disbursement Reports?	599's received by the 20th day of the following month	
4. If the recipient uses estimated accrual data, does FDOE understand the basis of the estimate and verifies if reasonable?	Recipient's Policies and Procedures 599's Project Award Budget	

(E) Indicator 3.b.4: Performance Reports
The project recipient's quarterly Financial Reports should agree with corresponding performance reports.
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Program Non-Compliance Policy
Green Book Section G - Special Conditions for the Approval of Project Applications and Project Amendments or the Termination of a Project

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. How does the project recipient ensure spending in accordance with its performance? • Will funds be exhausted prior to meeting performance goals? • If so, how will the project recipient address this?	State Office Quarterly Desk Top Reviews 599 Report	
2. If the project recipient's spending is not in accordance with its performance, document the explanation and determine if it is reasonable?	State Office Quarterly Desk Top Reviews Interview	
3. If the rate of expenditures is not in line with the performance report, obtain an explanation and assess the reasonableness of that explanation.	State Office Quarterly Desk Top Reviews 599	

Objective 3.c: Payment and Cash Management

The project recipient has a payment and cash management system in place to accurately track the receipt, disbursement and recording of funds between the awarding agency and project recipient. Such systems should readily track the handling of projects funds to sub-recipients, contractors and participants.

(C) Indicator 3.c.1: Cash Disbursements

The project recipient has a mechanism in place to minimize the time between the transfer of funds from Florida Grants System (FLAGS) and disbursement of funds to pay allowable costs.

Citations

CFR 200.305(b) and CFR 2900.7

FDOE Policies

Sub-Recipient Project Award/RFP/RFA Funding Method

FDOE Grants System, FLAGS Agency User

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have policies and procedures in place to minimize cash on hand? Are there sufficient internal controls in place to ensure proper segregation of duties for the following functions: recording, custodian, authorizing and reconciliation?	Recipient's Policies and Procedures	
2. What is the mechanism or tool used by the project recipient to determine the amount of cash to draw down? How often is it performed and reviewed?	Recipient's Policies and Procedures FLAGS Report	
3. Review a report from FLAGS and compare to DOE 599 Disbursement Report and Supporting Documentation. Were the cash draw-downs approved and reviewed by an appropriate manager? Were they used for immediate use?	FLAGS report 599	Document Request: FLAGS report for same 599 requested month
4. Is there a reconciliation performed between the cash draw-downs and the expenditures? Is it performed on a frequent basis and reviewed?	FLAGS report 599	
5. Does the project recipient have policies in place for payment of non-sufficient funds, overdraft fees and other penalties which cannot be paid using federal funds?	Recipient's Policies and Procedures	

(C) Indicator 3.c.2: Improper Payments

The project recipient can identify improper payments and has procedures in place to recapture improper payments.

Citations

CFR 200.305, CFR 200.426 and CFR 200.428

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management, Cost Standards

Green Book Section C - Fiscal and Program Accountability

Reference Guide for State Expenditures, Journal Transfers, Page 54

REFERENCE GUIDE FOR STATE EXPENDITURES

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have policies and procedures in place to identify and recapture improper payments? If not, what process does the project recipient have in place to identify and recapture improper payments?	Recipient's Policies and Procedures	
2. The costs incurred by a project recipient to recover improper payments are allowable as either direct or indirect costs, as appropriate. Is the project recipient consistent in the treatment of the federal dollars used to recover improper payments?	Recipient's Policies and Procedures	

(C) Indicator 3.c.3: Deposit Insurance
The project recipient has deposited its federal funds in an insured bank or savings association whenever possible.
Citation
CFR 200.305(b)(7)(iii)
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Attachment H, Fiscal Management
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Is the project recipient using an insured depository institution or bank that provides insurance coverage on deposits?	Interview or Supporting Documentation	

Objective 3.f: Allowable Cost and Cost Classification

The project recipient has a system and procedures in place to ensure that it is incurring necessary, reasonable and allowable costs to the project and that such costs are accurately classified in its accounting system. The project recipient also monitors the costs incurred by its contractors and sub-recipients to ensure allowability and accurate cost classification.

(C) Indicator 3.f.1: Cost Principles
The project recipient's written policy and procedures describe the allowability of costs in accordance with CFR 200(E) Cost Principles and have been issued to key personnel and, if applicable, sub-recipients.
Citations
CFR 200.302(b)(7) and CFR 200.403
FDOE Policies
Sub-recipient Project Award/RFP/RFA, Unallowable Expenses, Page 5; Attachment H, Fiscal Management, Cost Standards, State Office Allowable Cost Protocols Checklist
Green Book Section C - Fiscal and Program Accountability
Reference Guide for State Expenditures, page 74
REFERENCE GUIDE FOR STATE EXPENDITURES

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Do policies and procedures reflect the Uniform Guidance CFR 200(E) Cost Principles?	Recipient's Policies and Procedures Allowable Cost Principles Checklist	Document Request: Allowable Cost Principles Checklist to be completed, signed and returned by fiscal authority
2. Are these policies and procedures circulated to the appropriate personnel and financial and program staff?	Recipient's Policies and Procedures	
3. Are the personnel properly trained?	Recipient's Policies and Procedures	
4. How does the project recipient ensure that the project is not charged unallowable costs based on the Cost Principles and the provisions of the project agreement?	Recipient's Policies and Procedures Allowable Cost Principles	

(C) Indicator 3.f.2: Financial Management Systems
The project recipient has a system in place to ensure the costs are charged to the proper cost categories and are accurately classified.
Citations
CFR 200.412
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Administrative Costs Including Indirect Costs: federal
Green Book Section C - Fiscal and Program Accountability
Accounting Manual for Florida's College System Florida College System Accounting Manual 2024
Financial and Program Cost Accounting and Reporting for Florida Schools (Red Book)

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient's Chart of Accounts contain sufficient account codes for revenue and expenses to adequately track spending of project funds?	Recipient's Policies and Procedures Project/DOE 101S Approved Budget	
2. Does the project recipient's Chart of Accounts and its accounting system allow the tracking of grant activities that have an expenditure cap or threshold in accordance with the program's regulations? Refer to the program's program regulations for a full understanding of any expenditure caps or thresholds on project activities.	Project Award	

Objective 3.g: Cost Allocation/Indirect Costs

The project recipient allocates costs including indirect costs to the benefiting cost objectives based on relative benefits received and treats allocated costs consistently within its accounting system.

(C) Indicator 3.g.1: Cost Allocation Principles

There is written evidence that costs being allocated to the grant are allowable, being treated consistently over time and within the accounting system, are necessary, reasonable and are allocated to the grant based on benefit received.

Citations

CFR 200.403 and CFR 200.405

FDOE Policies

Sub-Recipient Project Award/RFP/RFA, Assurances; Attachment H, Fiscal Management, Cost Standards; Personnel Activities Report (PAR), Time and Effort Certification

Green Book Section C - Fiscal and Program Accountability

Green Book Section D - General Assurances, Terms and Conditions for Participation in Federal and State Programs

Accounting Manual for Florida's College System Florida College System Accounting Manual 2024

Financial and Program Cost Accounting and Reporting for Florida Schools (Red Book)

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the project recipient have written policies and procedures for distributing program costs, staff time and general administrative costs among funding streams, programs, etc.?	Recipient's Policies and Procedures PAR's Time and Effort Certifications	
2. Does the project recipient's policies and procedures follow the Cost Principles? How does it identify the circumstance when costs are allowable, allowable with condition and unallowable?	Recipient's Policies and Procedures 599's	
3. Does the project recipient's policies and procedures reflect requirements identified in the Project Award and applicable program/authorizing statutes and TEGLs?	Recipient's Policies and Procedures 599's	
4. From the sample of costs from the project recipient's 599's, general ledger and the Allowable Cost Checklist, confirm the following factors of allowable costs as described in CFR 200.403: • Necessary and reasonable for the performance of the project • Conform with federal law, guidelines and project terms • Conform to any limitations or exclusions set forth in the Cost Principals • Legal under state and local law • Consistently treated • In accordance with GAAP (except for state, local government and Indian tribes only)	Recipient's Policies and Procedures Allowable Cost Protocols 599 General Ledgers Supporting Documentation for General Ledgers	Documentation Request: 599 Report, Ledgers and complete supporting documentation for each charge for a specified month(s). Documentation includes Employee Timesheets and/or proof of compensation;

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
- Not included as a cost or used to meet matching requirement of another federally financed program - Adequately documented - Consistent with policies and procedures - During the testing of costs, for goods and/or services that require prior approval, was appropriate prior approval obtained prior to purchasing?		Travel documents, invoices, participant supportive services documentation and/or signatures of receipt

(C) Indicator 3.g.2: Cost Allocation Plan
The project recipient has an approved cost allocation plan and uses it to allocate indirect costs.
Citation
CFR 200.416(a)(c)
FDOE Policies
Sub-Recipient Project Award/RFP/RFA, Assurances; Attachment H, Personnel Activities Report (PAR), Time and Effort Certification
Green Book Section C - Fiscal and Program Accountability

Provider Review Protocol	Methods of Collection/ Examples of Documentary Evidence	Notes
1. How does the project recipient allocate staff's time among the various project programs they work on? Is there written evidence, such as timesheets, used to allocate personnel time and costs?	Staffing Breakout Form PAR's Time and Effort Certifications	