

Quality Assurance and Compliance

Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant

Jacksonville Plumbers and Pipefitters Joint Apprenticeship and Training Trust

February 10-14, 2025

Final Report

TABLE OF CONTENTS

1.	Introduction	I
	Authority	
	QAC Core Monitoring Guide	
	Provider Selection	
V.	Jacksonville Plumbers and Pipefitters Joint Apprenticeship and Training Trust	2
VI.	Monitoring Activities	2
VII.	Observation	3
VIII.	Results	6
IX.	Summary	6

Florida Department of Education Division of Career and Adult Education

Jacksonville Plumbers and Pipefitters Joint Apprenticeship and Training Trust Pathways to Career Opportunities Grant (PCOG) Quality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Division of Career and Adult Education (Division) within the Florida Department of Education (Department) has several key responsibilities, including leadership, resource allocation, technical assistance, monitoring and evaluation. These duties require the Division to oversee the performance and regulatory compliance of federal and state funding recipients. The Quality Assurance and Compliance (QAC) office plays a critical role in this process by designing, developing, implementing and evaluating a comprehensive quality assurance system, which includes monitoring. This system aims to ensure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is the Division's duty to regularly monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

Pursuant to Section 1008.32, Florida Statutes, Rule 6A-20.046, Florida Administrative Code, the PCOG Request for Proposal and the Uniform Grant Guidance, also referred to as 2 Code of Federal Regulations Part 200, the Department is responsible for monitoring programs run by a sub-grantee or provider of supported activities to ensure adherence to relevant federal and state regulations.

III. QAC CORE MONITORING GUIDE

The Core Monitoring Guide is designed to be utilized by any reviewer who is conducting an onsite or desk monitoring of any program currently administered by the Division. The guide includes a brief overview of each aspect of the monitoring design and the process, as well as objectives that can be used when agencies are monitored or reviewed. The guide can be found on the Division's website at: http://fldoe.org/academics/career-adult-edu/compliance.

IV. PROVIDER SELECTION

The QAC office may apply any specific monitoring strategy to any federal or state-funded provider at any time. There may be circumstances that may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

The Jacksonville Plumbers and Pipefitters Joint Apprenticeship and Training Trust (JATT) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Jeff Hendricks, President, on December 12, 2024. The designated representatives for the agency were Mr. Kirk Barras and Ms. Angel Clay.

The Division's representative conducting the VDMR was Program Specialist Michael Swift of the QAC.

V. JACKSONVILLE PLUMBERS AND PIPEFITTERS JOINT APPRENTICESHIP AND TRAINING TRUST

Finance

The provider was awarded the following grant for the fiscal year 2023-24:

FY 2023-24

GrantGrant NumberGrant AmountUnexpendedPathways to Career85P-90310-4P001\$ 618,000.00\$ 41,001.95

Opportunities

Additional information about the provider may be found at the following web address: https://ua234.com/

VI. MONITORING ACTIVITIES

The monitoring activities include pre- and post-review planning, an entrance and exit conference, records review and interviews with administrators, if necessary.

Onsite Visits

An onsite inventory review took place at the following location:

• JATT Training Center – Jacksonville, Florida

Entrance and Exit Conferences

An introductory pre-visit meeting was conducted on January 27, 2025. Email correspondence was shared with JATT to inform them of the outcome of their review. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Kirk Barras	Training Director, JATT	X	X
Angel Clay	Executive Assistant and Bookkeeper, JATT	X	X
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	X	X
Charles Davis	Program Specialist, QAC	X	
Dantavia Davis	Program Specialist, QAC	X	

Interviews

No interviews were necessary.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, part F. In addition, policies and procedures were examined and discussed at various times during the monitoring review.

VII. OBSERVATION

- **A.** <u>ADMINISTRATION</u> refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
 - JATT has over 75 years of experience since launching its first registered apprentice (RA) program in 1948. Since then, they have trained thousands of apprentices to journeyman status. More recently, over 170 apprentices have completed the program over the past five years.
 - JATT has a demonstrated history offering multi-occupation RA programs while developing a network of industry employer partners that hire and work directly with their apprentices.
 - In addition to being awarded state PCOG funds, JATT has experience managing contracts and grants from a wide variety of sources. Most notably, JATT enjoys a partnership with Hillsborough County Public Schools that annually awards upwards of \$500,000 in contracts to support the RA programs.
 - The current Training Director serves as a Board member for CareerSource Northeast Florida and is a member of several school advisory councils. This allows for a hand-in-hand partnership to create a pipeline of services that are shared by all parties involved.
 - PCOG deliverables were submitted to the Division on time, needing limited technical assistance. All deliverables were paid at or near full value.
- **B.** <u>DATA AND ASSESSMENT</u> refers to all the data and assessment system components, including test administration, test security, data collection, entry, reporting and procedures.
 - The Division's Data, Research and Evaluation team requested that the monitoring staff confirm JATT's PCOG enrollment numbers submitted to the Department reporting database. Enrollment data was requested for the following occupation:
 - o Plumber
 - o Pipefitter/Welder
 - o Heating, Ventilation and Air Conditioning (HVAC)
 - JATT provided sufficient enrollment data and documentation as required by the Department.
 - All documentation was provided by JATT as part of the monitoring review.
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to elements contributing to student learning and skill acquisition.
 - JATT's PCOG funding went toward the operating costs of its current RA programs. Occupations supported under PCOG include:
 - o HVAC
 - Pipefitter and Welder
 - o Plumber
 - At the time of receiving their state PCOG award, JATT had employer partnerships with over 40 participating contractors that train and employ their apprentices and journeyworkers. The participating employers are responsible, under the direction of JATT, to provide the on-the-job training (OJT) component of the program. Apprentices are trained and work under the direct supervision of a journeyworker during their five years in the apprentice program. Apprentices must work 40-hour work weeks, totaling 2,000 hours per year.
 - The ratio for OJT is three journeymen for every two apprentices. Most of the journeymen are multi-trade contractors and provide a wide range of projects for apprentices to work on.
 - All apprentices begin at an entry level pay wage and are guaranteed three percent wage increases for the duration of the program.

- JATT provides its own related technical instruction (RTI) and uses nationally recognized instruction and curriculum from the United Association of Plumbers and Pipefitters. All apprentices, despite their occupation, must have at least 232 hours of RTI per year.
- JATT has a rigorous selection process that screens potential apprentices for those who are most likely to stay in the program for the entire five-year duration. This has resulted in a first-year retention rate of 92 percent over the past five years. Additionally, those who make it beyond the first-year graduate from the program at a rate of 85 percent.
- Once accepted into the program, JATT provides resource referrals and wraparound support to help reduce or eliminate barriers that may prevent a student from completing their apprenticeship.
- JATT employer sponsors are required to sign an apprenticeship sponsor agreement. These agreements dictate the educational aspects of the program, as well as ensuring that apprentices follow all OJT and RTI learning criteria. The employer sponsors also serve on committees that meet regularly with JATT workforce training staff to continually update and refine their programs.
- **D.** <u>TECHNOLOGY AND EQUIPMENT</u> refer to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.
 - For the years monitored, JATT utilized state grant funds to purchase equipment that met the capitalized threshold of \$5,000. Additionally, equipment was purchased that also met the inventory control threshold of \$1,000. All inventory records were provided by JATT.
 - Monitoring staff conducted an inventory review at JATT's Jacksonville training site, and all
 inventory was accounted for and in its correct location. QAC staff verified all inventory at the
 \$5,000 threshold, as well as spot checked \$1,000 items for internal controls compliance. No
 issues were uncovered.
 - JATT has a fixed asset policy and procedures manual that includes:
 - Depreciation
 - Asset tagging
 - Inventory procedures
 - o Procurement of equipment
 - Accounting policies
 - Disposition
 - Auditing and compliance
 - The Training Director is responsible for all equipment and inventory purchased with grant funds. This individual is also responsible for the annual inventory of all items on the Equipment Inventory Control List.
 - JATT reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
- **E. RECORDS REVIEW** refers to reviewing the records and documents supporting compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.

Documents reviewed were:

- Policies and procedures for financial accounting
- Fixed asset policy and procedures
- Apprenticeship employer agreement form
- Final Project Disbursement Report
- Grant Budget Analysis (GBA)
- Monthly transaction ledger

- PCOG performance outcome forms
- Purchase invoices
- Purchasing card (P-card) transactions
- Financial statements
- Quarterly activity reports
- Quarterly deliverables
- Insurance documentation
- **FINANCIAL** refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management and allowable costs.
 - QuickBooks® is used as JATT's financial management system. Grants, contracts, deliverables and all aspects of fiscal management are housed within the system.
 - JATT does pay for salaried administrative and instructor positions with PCOG funds. Time and effort reports were provided by JATT.
 - JATT does use grant-funded P-cards for the procurement of goods. All purchases made with P-cards must receive prior approval and be used solely for the operation of the grant-funded program. When a P-card is used, it is the responsibility of the authorized card holder to submit proper documentation to the finance department for reconciliation toward the appropriate grant fund. Reconciliation takes place on a monthly basis.
 - JATT has policies and procedures for financial management and fiscal reporting that adhere to the terms of their state grant. The following components of their financial policies and procedures manual were reviewed as part of the monitoring process:
 - P-card authority
 - Accounting
 - o Payroll and timesheet
 - o Reconciliation statement
 - Signature authority
 - o Procurement and petty cash purchases
 - o Conflict of Interest

All procedural documents were provided by JATT.

- JATT provided additional fiscal records such as:
 - Purchase invoices
 - Time and effort reports
 - o Earning statements
 - o Financial statements

All records were in accordance with applicable local, state and federal law.

- No purchases shall be authorized without prior approval from the Division via a grant award letter and/or subsequent amendment(s). Upon approval from the Division, the Training Director is responsible for all purchases charged to the state award.
- All approved purchases using PCOG funds require at least three bids, if possible. The Training Director has purchasing authority for items up to \$5,000. Anything beyond that threshold requires approval from the Board of Directors.
- QAC monitoring staff conducted a fiscal review of the providers' grant budget analysis (GBA). All object codes and dollar amounts pre-approved on their grant award were adhered to.

- **G.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.
 - JATT has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within their service area. The list of partners includes, but is not limited to:
 - o CareerSource Northeast Florida
 - Carrier Corporation
 - Cogburn Brothers
 - o Siemens Building Technology, Incorporated
 - o WW Gay Mechanical Construction
 - Hillsborough County Public Schools
 - o The Florida Youth Challenge Academy

VIII. RESULTS

JATT was not found to be out of compliance.

IX. SUMMARY

After completing the monitoring review and receiving any additional information requested, a preliminary report is sent to the provider for their review. The Division monitoring team lead may consider comments at their discretion. Once the final report is approved, it will be sent to the agency head and a copy will be sent to the provider's designated contact person. The final report will also be posted on the Department's website, which can be found at:

https://www.fldoe.org/academics/career-adult-edu/

Once all outstanding corrective action plan items have been completed (when applicable), the Division will issue a closure letter to the agency head and designated contact person. This letter will signify the end of the monitoring process and that no further action is required.

On behalf of the Division, the monitoring team would like to extend their appreciation to all participants in the JATT monitoring review. A special thanks is offered to Ms. Angelia Clay and Mr. Kirk Barras for their participation and leadership during this process.

Please address inquiries regarding this report to:

Kara Kearce
Director of Quality Assurance and Compliance
Kara.Kearce@fldoe.org
(850) 245-9033

Florida Department of Education
Division of Career, Technical and Adult Education
325 West Gaines Street · Room 722A
Tallahassee, Florida 32399