



FLORIDA DEPARTMENT OF  
**EDUCATION**  
CAREER AND ADULT EDUCATION

# **Quality Assurance and Compliance**

## **Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant**

**Lockheed Martin Corporation**

**October 2024**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education

**Lockheed Martin Corporation  
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 Lockheed Martin Corporation (LMC) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Joe Gustafson, Director, Workforce and Economic Development, on August 16, 2024. The designated representative for the agency was Mr. Tony Fusco, Project Analyst, Training Funding Partners.

## V. JUNIOR ACHEIVEMENT OF SOUTH FLORIDA

### Finance

The provider was awarded the following grant(s) for the fiscal year(s) 2020-22 and 2021-22:

#### **FY 2020-22**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	89E-90310-1D301	\$ 574,660.00	\$ 0.00

#### **FY 2021-22**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	90L-90310-2D401	\$ 103,750.00	\$ 77,872.50*

*\*See narrative Section*

Additional information about the provider may be found at the following web address:

<https://www.lockheedmartin.com/en-us/index.html>

## 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

No onsite visits were necessary as part of the monitoring review.

### Entrance and Exit Conferences

An introductory pre-visit meeting was conducted on November 20, 2024. LMC was provided with email correspondence regarding the outcome of their monitoring review. The participants are listed below:

<b>Name</b>	<b>Title</b>	<b>Entrance Conference</b>	<b>Exit Conference</b>
Tony Fusco	Project Analyst, Training Funding Partners	X	X
Julianna Kirby	Chief Operating Officer, Training Funding Partners	X	X
<b>Division Monitoring Team</b>			
Michael Swift	Program Specialist, QAC	X	X
Charles Davis	Program Specialist, QAC	X	

### Interviews

Aside from the introductory pre-visit meeting, no interviews were necessary as part of the monitoring review.

### 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. Additionally, the Division's Research and Evaluation team requested that the monitoring team lead verify PCOG enrollees. All enrollment numbers were provided by LMC.

### Narrative

In the 2021-22 PCOG competitive grant process, LMC submitted two applications. One application for an apprenticeship expansion and the other for a new pre-apprenticeship program. Despite requesting \$346,100 for the expansion program, LMC was awarded \$103,750 due to unallowable costs including very large contractual service agreements (total of \$187,500) that did not meet the criteria for direct student support or direct student contact in addition to two LMC personnel positions (total of \$54,850) that also did not meet the same criteria. Ms. Julianna Kirby formally withdrew the expansion apprenticeship program from the PCOG funding opportunity. All PCOG funds for project 90L-90310-2D401 (apprenticeship expansion) were returned by the provider.

Additionally, LMC informed the Division of their intent to withdraw from project 90L-90310-2D402 (new pre-apprenticeship). No funding was ever disbursed.

## **VII. OBSERVATION**

- A. **ADMINISTRATION** refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
- The ability to manage their grant(s) apprenticeship programs stem from LMC and their partnership with the Institute for American Apprenticeships (IAA). In conjunction with LMC, IAA provides a variety of technical support and implementation services. IAA has built many successful apprenticeship programs since 2000.
  - LMC has a demonstrated history of training their own apprentices dating back to 2016. Additionally, LMC is a global security, aerospace and information technology company with its own work-based learning programs dedicated to their apprentice programs.
  - LMC worked with CareerSource Citrus Levy Marion, CareerSource Brevard and CareerSource Central Florida to ensure local workforce needs were being met. CareerSource would provide employer and participant referrals, and additional training, when available.
  - Deliverables are submitted to the Division on time and with minimal errors. Most deliverables were paid at or near full value.
- B. **DATA AND ASSESSMENT** refers to all the data and assessment system components, including test administration, test security, data collection, entry, reporting and procedures. The use of data in program decision-making is also explored and commented on.
- The Division's Data, Research and Evaluation team requested that the monitoring staff confirm LMC's PCOG enrollment numbers submitted to the state reporting database. Enrollment data was requested for the following occupation:
    - Inspectors and IT management
  - LMC provided sufficient enrollment data and documentation as required by the Department.
  - All documentation was provided by LMC as part of the monitoring review.
- C. **CURRICULUM AND INSTRUCTION** refers to elements contributing to student learning and skill acquisition.
- No curriculum to report on, as LMC withdrew from PCOG funding consideration in 2021-22.

- D. **TECHNOLOGY AND EQUIPMENT** 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 LMC did not utilize state grant funds to purchase any equipment that met the capitalized threshold of \$5,000. No inventory review was required.
- 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:**
- Notice of project cancellation from LMC
  - Policies and procedures for financial accounting
  - Final Project Disbursement Report
  - Grant Budget Analysis (GBA)
  - PCOG performance outcome forms
  - Time and effort reports
  - Apprenticeship activity reports
  - Procurement records (non-capitalized) – provided with quarterly deliverables
  - Quarterly deliverables
  - Quarterly payroll activity reports
- F. **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.

- SAP® is used as LMC's financial management system. Grants, deliverables and all aspects of fiscal management are housed within the system.
- LMC does pay for two salaried positions and supports contractual services with PCOG funding. Time and effort reports were provided by LMC.
- LMC 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:
  - Cash Management
  - Credit Card Management (Purchasing card)
  - Accounting
  - Payroll and Personnel Services
  - Procurement
  - Conflict of InterestAll procedural documents were provided by LMC.
- LMC does not have a dedicated contract manager position, but if any contractual agreements are entered, they are managed by the LMC Workforce Development team. The Workforce Development team is also responsible for ensuring that all agreements include the necessary components, including contract provisions and deliverables, if any.
- LMC provided additional fiscal records such as:
  - Time and effort payroll reports
  - Procurement records (non-capitalized)All records were in accordance with applicable local, state and federal law.

- QAC monitoring staff conducted a fiscal review of the provider's GBA. All object codes and dollar amounts pre-approved in their grant award were adhered to.

**G. COLLABORATION** refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.

- LMC has numerous collaborations and partnerships 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:
  - CareerSource Citrus Levy Marion
  - CareerSource Central Florida
  - CareerSource Brevard
  - Boys and Girls Club of Broward County
  - College of Central Florida
  - The Institute for American Apprenticeships

## **VIII. RESULTS**

LMC 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 Lockheed Martin Corporation monitoring review. A special thanks is offered to Mr. Tony Fusco and Ms. Julianna Kirby for their participation and leadership during this process.



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