



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

## **Quality Assurance and Compliance**

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

**Manufacturing Pathways, LLC**

**November 2024**

**Final Report**

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Florida Department of Education  
Division of Career and Adult Education

**Manufacturing Pathways, LLC  
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 Manufacturing Pathways, LLC (MP) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Ms. Dominique Gentile on August 16, 2024. In response to the notification memo, it was brought to our attention that Ms. Gentile was no longer with the company. The designated representative for the agency was Ms. Patricia Baker, Executive Vice President, Structural Composites.

## V. MANUFACTURING PATHWAYS, LLC

PCOG enrollment by occupation:

- Industrial Manufacturing Technician (2022-23) – 18

### **Finance**

The provider was awarded the following grant(s) for the fiscal year (FY) 2022-23:

#### **FY 2022-23**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	87C-90310-3Q601	\$ 1,066,645.00	\$ 22,895.70

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

<https://structuralcomposites.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

- No onsite visits were conducted as part of the monitoring review.

### Entrance and Exit Conferences

An introductory pre-visit meeting was conducted on October 30, 2024. The participants are listed below:

<b>Name</b>	<b>Title</b>	<b>Entrance Conference</b>	<b>Exit Conference</b>
Patricia Baker	Executive Vice President, Structural Composites	X	
Kurt Hopf	Vice President of Engineering and Technology, Structural Composites	X	
Scott Lewit	President, Structural Composites	X	
Tanya McCaully	Vice President of Operations, Compsys	X	
<b>Division Monitoring Team</b>			
Michael Swift	Program Specialist, QAC	X	X
Chuck 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 MP.

## VII. OBSERVATION

A. **ADMINISTRATION** refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.

- MP is a consortium with numerous industry partners and members. One of those partners, Structural Composites, Inc. (SCI), is led by managing member, Scott Levit. Mr. Levit has years of industry experience and is certified to train pre-apprentices. The Chief Executive Officer is a college professor at the Florida Institute of Technology and is also certified to lead the pre-apprenticeship program.
- The individuals tasked with managing the PCOG grant all have various degrees of experience within the engineering and manufacturing industries.
- In addition to the many years of experience from the grants managing partners, SCI has been training interns for approximately 35 years prior to partnering with MP to serve their pre-apprenticeship students.
- To accomplish the goals and scope of the PCOG grant(s), MP partners with many stakeholders outside of their consortium group to ensure up to date and high quality instruction for program enrollees.
- Deliverables are submitted to the Division on time and grant amendments are submitted requiring only technical edits. Deliverables are typically paid at 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 MP's PCOG enrollment numbers submitted to the state reporting database. Enrollment data was requested for the following occupations:
  - Industrial Manufacturing Technician
- MP provided sufficient enrollment data and documentation as required by the Division.
- All documentation was provided by MP as part of the monitoring review.

C. **CURRICULUM AND INSTRUCTION** refers to elements contributing to student learning and skill acquisition.

- For fiscal year 2022-23 MP utilized its state PCOG award for the creation of a new engineering/manufacturing pre-apprenticeship program. The accompanying Registered Apprenticeship sponsor is FloridaMakes Industrial Manufacturing Technician Apprenticeship Program.
- With approximately 12,000 job vacancies in the manufacturing industry, the sector also has one of the higher median ages for employees. The MP Advanced Manufacturing Pre-Apprenticeship Program (AMPAP) aims to lower the median age in the industry, as well as give underrepresented populations a path to employment.
- In conjunction with FloridaMakes, students exiting the pre-apprenticeship program will filter into the Industrial Manufacturing Technician apprenticeship program.
- MP will provide related technical instruction (RTI) instructors for the pre-apprenticeship program. AMPAP will deliver an interactive, hands-on classroom-based instructional model via their partnering local education agency, Brevard Public Schools.
- All instructors are required to be licensed and/or certified in their field or have previously completed a Composite Pathways Program.

- In addition to providing the RTI for program enrollees, MP also offers professional learning opportunities for faculty and staff within the school district. Faculty also has the opportunity to gain experience by serving as mentors for pre-apprenticeship students.

**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 year monitored MP did not utilize state grant funds to purchase any equipment that met the capitalized threshold of \$5,000. Additionally, no items were purchased that cost more than \$1,000. No inventory review was required.
- Despite not purchasing any capitalized equipment, MP has policies and procedures on asset management.

**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 reporting
- Policies and procedures for property accounting and management
- Final Project Disbursement Report
- Grant Budget Analysis
- PCOG performance outcome forms
- Apprenticeship activity reports
- Procurement records – all items less than \$1,000
- Quarterly deliverables

**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.

- QuickBooks® is used as MP's financial management system. Purchases, contracts, deliverables and all aspects of fiscal management are housed within the system.
- MP does not pay salaried positions with grant funds but does support numerous contractual agreements with PCOG funding. All instructional and programmatic positions are subcontracted.
- Although MP made no capitalized equipment purchases, the provider does have policies and procedures on competitive procurement requirements.
  - Purchasing cards are used for minor acquisitions.
- MP does not employ a dedicated contract manager. It is the responsibility of the Finance Director to ensure all terms of a contract are adhered to and paid appropriately.
- The following components of their financial policies and procedures manual were reviewed as part of the monitoring process:
  - Purchasing guidelines and procedures
  - Budgeting
  - Procurement
  - Sole source purchases
  - Asset management
  - Contract Management

- All supplies, equipment and services charged to a grant-funded source shall be purchased using a Purchase Requisition form and approved by the Finance Director. The only exceptions are items previously approved in a contractual agreement.
- MP provided additional fiscal records such as:
  - Invoice records
  - Travel
 All records were in accordance with applicable local, state and federal law.
- QAC monitoring staff conducted a fiscal review of the providers' grant budget analysis (GBA). All object codes and dollar amounts pre-approved within their grant award were adhered to.
- MP submitted multiple invoices for purchases that were deemed unallowable by the PCOG grant manager. This did not result in a finding, as the provider was not reimbursed for the purchases.

**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.

- MP 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:
  - Brevard Public Schools
  - CareerSource Brevard
  - COMPSYS, Inc.
  - Structural Composites, Inc.
  - Aviara Boats

## **VIII. RESULTS**

MP 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 Manufacturing Pathways, LLC monitoring review. A special thanks is offered to Ms. Patricia Baker for her participation and leadership during this process.



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