



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

# **Quality Assurance and Compliance**

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

ABC Institute, Incorporated

**December 2024**

Final Report

## TABLE OF CONTENTS

I.	Introduction .....	1
II.	Authority .....	1
III.	QAC Core Monitoring Guide.....	1
IV.	Provider Selection .....	1
V.	ABC Institute, Incorporated .....	2
VI.	Monitoring Activities .....	2
VII.	Observation .....	3
VIII.	Results .....	6
IX.	Summary .....	6

Florida Department of Education  
Division of Career and Adult Education

**ABC Institute, Incorporated**  
**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 American Builders and Contractors Florida East Coast Chapter, Incorporated (ABC) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Peter Dyga, President and Chief Executive Officer, on August 16, 2024. The designated representative for the agency was Ms. Gina Godette. The Division's representative conducting the VDMR was Program Specialist Michael Swift of the QAC.

**V. AMERICAN BUILDERS AND CONTRACTORS FLORIDA EAST COAST CHAPTER, INCORPORATED**

**Finance**

The provider was awarded the following grant(s) for the fiscal year(s) 2019-21, 2020-22, 2021-23, 2022-23 and 2023-24:

**FY 2019-21**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	95Z-90310-0D004	\$ 260,149.60	\$ 0.00

**FY 2020-22**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	95Z-90310-1D301	\$ 341,500.00	\$ 0.00

**FY 2021-23**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	95Z-90310-2D401	\$ 443,166.00	\$ 0.00

**FY 2022-23**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	95Z-90310-3Q501	\$ 543,773.00	\$ 38,027.66

**FY 2023-24**

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	95Z-90310-4P001	\$ 1,300,000.00	\$ 39,447.48

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

<https://www.abc.org/>

**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 December 9, 2024. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Gina Godette	Administrative Assistant, ABC	X	
Alberto Altamiranda	Director of Education, ABC	X	
Peter Dyga	President and Chief Executive Officer (COO), ABC	X	

<b>Division Monitoring Team</b>			
Michael Swift	Program Specialist, QAC	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.

## **VII. OBSERVATION**

- A. **ADMINISTRATION** refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
- ABC is an organization of general contractors, subcontractors, suppliers and associates founded in 1950. As an organization, the ABC Institute Apprenticeship College has a history of providing Registered Apprenticeship (RA) programs in Florida since 1976. RA programs are offered across multiple locations throughout the state, teach multiple occupations and provide services in many languages.
  - As the largest provider of apprenticeship education in the state, ABC has shown an ability to manage their grant(s) and RA programs. ABC and its affiliate sponsors have well over one hundred years of combined program and trade experience.
  - The President and CEO of the ABC Institute was appointed by the Florida Legislature to serve on the Workforce Development Task Force created in 2016 and was subsequently elected Chair of the Task Force. He also serves on the Construction Industry Advisory Council of the Florida International University, School of Engineering and Computing, Moss Department of Construction Management. The Vice President of ABC has also served on the State Apprenticeship Advisory Council.
  - ABC has been awarded state PCOG funding for every year the grant has been offered since 2019-2020.
  - ABC, CareerSource Palm Beach, CareerSource South Florida and CareerSource Broward work in conjunction to ensure local workforce needs are being met. CareerSource provides employer and participant referrals, and additional training, when available.
  - Deliverables are submitted to the Division on time and with minimal errors. All 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.
- ABC is not required to report student data through the state data reporting system; no data was verified during the review.
- C. **CURRICULUM AND INSTRUCTION** refers to elements contributing to student learning and skill acquisition.

- All of ABC's PCOG funding has gone toward the expansion of current RA programs. Occupations sponsored under PCOG include, Project Management, Construction Laborer, Electricians, Plumbers, Pipefitters, Roofers, Fire alarm Systems and Heating and Air Conditioning.
- A detailed market analysis of the Construction Trades industry showed that much of the workforce is reaching retirement age, in addition to comprising a smaller pool of skilled labor to fill current and future voids.
- There is also a lack diversity, specifically with women. The RA programs seek to diversify the industry by bringing awareness of the construction industry and careers to underrepresented populations. ABC aims to achieve this by targeting specific zip codes and key demographic areas. Multiple CareerSource boards assist in targeting those populations, as well as under employed individuals who are interested in the construction trades industry.
- The ABC RA program is a hybrid approach based on required technical instruction (RTI) hours and competency, while incorporating exams, lab work and on-the-job-training (OJT) to assess student progress before moving on to advanced modules and skills. Each occupation has a specific number of classroom and RTI hours, while all hands-on OTJ is a minimum of 2,000 hours.
- All RTI includes established trade curriculum that is created and maintained by the National Center for Construction Education and Research, which includes a combination of textbook, video, experiential and lab components.
- ABC employer partners 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 learning criteria.

**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 ABC did not utilize state grant funds to purchase any equipment that met the capitalized threshold of \$5,000. No inventory review was required. However, ABC provided inventory listings for all equipment purchased with PCOG funds, including those with a value of at least \$1,000 but less than \$5,000.
- Although no capitalized equipment was purchased during the years monitored, ABC utilizes the One Key Inventory System to effectively monitor and track all grant-funded equipment.
- The Craft Instructor/Program Manager is responsible for all equipment that is purchased with PCOG funds. The job description for this position was provided by ABC.

**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
- Apprenticeship employer agreement form
- Final Project Disbursement Report
- Grant Budget Analysis (GBA)
- PCOG performance outcome forms
- Apprenticeship activity reports
- Procurement records (non-capitalized) – provided with quarterly deliverables
- Quarterly deliverables
- Quarterly payroll activity reports and time and effort reports

- ABC employee handbook
- Multiple job descriptions

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.

- The Sage 50 platform is used as ABC's financial management system. Grants, contracts, deliverables and all aspects of fiscal management are housed within the system. Additionally, invoices and payments are routinely monitored by the finance department to ensure compliance with the agreed upon fiscal terms and conditions of their state award(s).
- ABC does pay salaried positions with PCOG funding. Staff records are maintained and monitored through a clock-in and clock-out platform called u-attend. Time and effort reports were provided by ABC.
- ABC does use grant-funded P-cards for expenditures. All purchases made with P-cards must receive prior approval and be used solely for the operation of a grant-funded program or when encumbering expenses necessary for tasks outlined in their approved grant applications. When a P-card is used, it is the responsibility of the authorized card holder to submit proper documentation for reconciliation toward the appropriate grant fund. Sample P-card transactions and reconciliations were provided by ABC.
- ABC does not have a dedicated contract manager position. The COO and Director of Education are responsible for overseeing the negotiation, administration and compliance of contracts entered into by the provider.
- ABC 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 and disbursement
  - Credit Card Management (Purchasing card)
  - Accounting
  - Payroll and Personnel Services
  - Procurement
  - Conflict of Interest
 All procedural documents were provided by ABC.
- ABC provided additional fiscal records such as:
  - Time and effort payroll reports
  - Procurement records (non-capitalized)
  - Inventory (non-capitalized)
 All records were in accordance with applicable local, state and federal law.
- QAC monitoring staff conducted a fiscal review of the providers' GBA. All object codes and dollar amounts pre-approved on 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.

- ABC 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:
  - CareerSource South Florida
  - CareerSource Palm Beach
  - CareerSource Broward
  - Florida International University

- Milagro Center
- Boys and Girls Club
- Junior Achievement

## **VIII. RESULTS**

ABC 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 ABC monitoring review. A special thanks is offered to Ms. Gina Godette for her participation and leadership during this process.





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