

# **Quality Assurance and Compliance**

Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant

AmSkills, Inc.

September 23-27, 2024

Final Report

# TABLE OF CONTENTS

I.	Introduction	. 1
II.	Authority	. 1
	QAC Core Monitoring Guide	
IV.	Provider Selection	. 1
V.	AmSkills, Inc	. 2
VI.	Monitoring Activities	. 2
VII.	Observation	. 3
VIII.	Results	. 5
IX.	Summary	. 5

# Florida Department of Education Division of Career and Adult Education

# AmSkills, Inc. 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.

#### II. AUTHORITY

Pursuant to Section 1008.32, Florida Statutes, Rule 6A-20.046, Florida Administrative Code, the Pathways to Career Opportunities Grant 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. You can find the guide on the Division's website at <a href="http://fldoe.org/academics/career-adult-edu/compliance">http://fldoe.org/academics/career-adult-edu/compliance</a>.

# 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.

AmSkills, Inc. monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Tom Mudano, President, on July 23, 2024. The designated representatives for the agency was Mr. Tom Mudano.

The Division's representative conducting the VDMR was Program Specialist Charles Davis of the QAC.

# V. AMSKILLS, INC.

## **Finance**

The provider was awarded the following grant(s) for fiscal years 2019-2020, 2020-2021, 2021-2022, 2022-2023:

#### FY 2019-20

Grants Pathways to Career Opportunities	<u>Grant Number</u> 51B-90310-0D001	Grant Amount \$ 559,203.00	Unexpended \$ .00
FY 2020-21 Grants Pathways to Career Opportunities Pathways to Career Opportunities	<u>Grant Number</u> 51B-90310-1D301 51B-90310-1D302	Grant Amount \$ 540,813.00 \$ 601,463.30	<u>Unexpended</u> \$ 964.35 \$ .00
FY 2021-22 Grants Pathways to Career Opportunities	<u>Grant Number</u> 51B-90310-2D401	Grant Amount \$ 444,540.00	<u>Unexpended</u> \$ 1,830.34
FY 2022-23 Grants Pathways to Career Opportunities	Grant Number 51B-90310-3Q501	Grant Amount \$ 425,106.00	Unexpended \$ 7,875.20

Additional information about the provider may be found at the following web address: <a href="https://www.amskills.org/">https://www.amskills.org/</a>

## 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

o Workforce Training Innovation Center - Holiday, Florida

# Entrance and Exit Conferences

An introductory telephone meeting with Tom Mudano took place on July 26, 2024. An exit telephone meeting took place on Sept 27, 2024 to inform him of the final standing of the monitoring review.

Name	Title	Entrance	Exit
		Conference	Conference
Tom Mudano	President & CEO, AmSkills	X	X
<b>Division Monitoring</b>			
Team			
Michael Swift	Program Specialist, QAC	X	X
Chuck Davis	Program Specialist, QAC	X	X

#### Narrative

AmSkills is an industry-led program launched in 2015, offering Registered Apprenticeships in Manual Machining, CNC Machining, and Mechatronics, as well as prepprenticeship programs for both adults and high school students. They collaborate with local employers to build a skilled workforce, addressing entry-level workforce challenges through their career discovery Bootcamp, which introduces candidates to training opportunities and registers them for preapprenticeship programs. Participants continue their training after being employed, enhancing their skills while allowing employers to evaluate them before committing to a full apprenticeship. AmSkills supports manufacturers in developing and managing these programs.

#### 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.
  - AmSkills conducts a combination of classroom-based instruction, online and hands-on using the equipment outlined in their proposal or other existing equipment. The selection of all instructional materials and projects has been reviewed with local employers to ensure that AmSkills Apprenticeship is meeting their needs, and they were involved in the selection of all proposed equipment purchases. AmSkills utilizes Amatrol Technical education training systems as its primary educational tool. Their partner manufacturers selected Amatrol. The Tampa Bay region is a large metropolitan area, making it challenging for people to travel to the AmSkills Workforce Training Center, located in West Pasco County. To address this, they have implemented mobile training programs utilizing the AmSkills Mobile Workshops. This allows AmSkills to utilize their portable equipment to travel to various locations throughout the Tampa Bay region, providing training for their students closer to where they live or work. They have also provided training directly at the employers' location, eliminating travel time and providing on the job training for their employees.
- **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 use of data in program decision-making is also explored and commented.
  - Since the provider is not required to report student data through the state data reporting system, no data was verified during the review.
- **C.** <u>CURRICULUM AND INSTRUCTION</u> refer to those elements that contribute to student learning and skill acquisition.
  - No curriculum and instruction were observed during the monitoring review.
- **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.
  - All inventory with the value of \$1,000 met the criteria set forth by federal, state and local guidelines and is included within their fixed asset system.

**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:

- Procedures for finance and procurement
- Policies and procedures for property management
- Inventory records
- Procurement records
- Standards of Apprenticeship manual
- Employee/employer Apprenticeship contract
- Instructional and on the job training manual
- **F. <u>FINANCIAL</u>** 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 Finance & Accounting Controller ensures the efficient management of PCOG grant funds. The following components of their financial policies and procedures manual were reviewed:
    - Budget Implementation
    - o Cash Management
    - Methods of accounting
    - o Fiscal internal controls
    - o Records and reporting
    - o Inventory Management
    - Procurement
    - Conflict of interests
  - Monitoring staff conducted a budget analysis of AmSkills's Department grants.
- **G.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships or memoranda of understanding that are in place to benefit an agency's programs and students.
  - AmSkills has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students. The list of partners includes but is not limited to the following:
    - o Advanced Robotics for Manufacturing Institute
    - o CareerSource Central Florida
    - Harvest Croo Robotics
    - Pasco County Schools

# VIII. RESULTS

There are concerns that the Registered Apprenticeship and Preapprenticeship programs do not comply with the Code of Federal Regulations and State Board Rules. See details below.

Program Concerns	1	
Area	Enrollment	
Details	<ol> <li>No training is occurring in the AmSkills Apprenticeship Program, GNJ (2019-FL-72596), which was registered in 2019. All apprentices have been cancelled from the program.</li> <li>No training has occurred in the AmSkills High School Preapprenticeship Program (P-113), which was registered in 2021, nor have any preapprentices been reported to the Department.</li> <li>If no training is occurring in the AmSkills Apprenticeship Program, GNJ (2019-FL-72596), then preapprentices enrolled in the AmSkills PreApprenticeship Program (P-092) do not have a viable pathway into registered apprenticeship, as this is currently the only sponsoring registered apprenticeship program.</li> </ol>	
Effectiveness	<ol> <li>Per 29 CFR 29.6(a), "Every registered apprenticeship program must have at least one registered apprentice, except for the following specified periods of time, which may not exceed 1 year: (1) Between the date when a program is registered and the date of registration for its first apprentice(s); or (2) Between the date that a program graduates an apprentice and the date of registration for the next apprentice(s) in the program."</li> <li>Per Rule 6A-23.010(3)(f), "Preapprenticeship programs must be actively training preapprentices within one (1) year of registration. Programs which go inactive and remain the same (no participants training occurring) for more than one (1) year shall be canceled."</li> <li>Per Rule 6A-23.010(1), "The primary objective of the preapprenticeship program is to provide Florida residents with educational and training opportunities to enable them, upon completion of preapprenticeship training, to obtain entrance into a registered apprenticeship program, based upon the selection criteria established by a registered apprenticeship program sponsor."</li> </ol>	

Finding Number	1				
Area	Equipment				
Finding Summary	Use of Equipment Not Aligned With Grant Purpose				
Finding Detail	Between 2019 and 2023, AmSkills received \$1,659,890.30 in Pathways to Career Opportunities Grant (PCOG) funding for the purchase of instructional equipment explicitly designated for use in active, registered apprenticeship and preapprenticeship programs. Despite this, AmSkills has not completed any apprentices and has only completed one preapprentice in 2023. The equipment is currently used for boot camps and public demonstrations—activities that are not aligned with the stated purpose and scope of the grant.				
Citation	Section 273.02, Florida Statutes; Rule 69I-72.003, F.A.C.; PCOG Grant Agreements – Sections 8, 9, and Exhibit 1, FDOE Greenbook				
Recommended / Anticipated Corrective Action	AmSkills is directed to transfer all PCOG-funded equipment to an eligible training provider currently operating a registered apprenticeship or preapprenticeship program. This transfer must be executed in full coordination with the Division, which will identify appropriate recipients. AmSkills must cooperate fully to facilitate the timely relocation of the equipment.				
Anticipated completion date:	September 2025				
Name(s) and Title(s) responsible for corrective action:	Tom Mudano, Executive Director				
Plan accepted by: Kara Kearce Date:					
Status of Action Plan (to be completed by FDOE staff) Status of CAP: Open Date: July 14, 2025					

# 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, at:

http://fldoe.org/academics/career-adult-edu/compliance

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 AmSkills, Inc. VDMR. A special thanks is offered to Mr. Tom Mudano for his participation and leadership during this process.

Please address inquiries regarding this report to:

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