

Department of Education
Office of Inspector General – Internal Audit
Six-Month Status Report on: Bureau of Family and Community Outreach – 21st Century Community Learning Center Grants
Report #A-2122DOE-019 Issued: September 22, 2023
Status as of March 22, 2024

Finding	Recommendation(s)	Previous Management Responses	Management Response as of March 22, 2024	Anticipated Completion Date & Contact
<p>Some OASAS deliverable submissions did not include all required reporting elements, and BFCO approved invoices for payment despite the missing deliverables.</p>	<p>We recommend that BFCO work with OASAS and the Orange County Public School District to ensure data necessary to comply with all deliverable reporting requirements is available to OASAS for future grant periods. We further recommend that BFCO reviews all submitted deliverables in accordance with the Monitoring and Compliance Unit Standard Operating Procedures and ensures all deliverables are satisfactorily completed prior to authorizing payment.</p>	<p>Management Response as of September 22, 2023</p> <p>BFCO concurs with the finding. BFCO will remove the requirement of submission of progress report grades from its subrecipients as a requirement for deliverable approval. Report card grades will serve as the continuous improvement indicator for academic performance.</p> <p>Regarding behavioral data collection, BFCO will modify its requirements to include special conditions for subrecipients whose school districts do not provide monthly behavioral data. BFCO will require that the subrecipient must provide a letter on letterhead from the school district that indicates the time frames for which their behavioral data is</p>	<p>BFCO removed the requirement of submission of progress report grades from its subrecipients as a requirement for deliverable approval. Report card grades are now used as a continuous improvement indicator for academic performance. This was communicated to all subrecipients during the 21st CCLC Fall Technical Assistance meeting on October 3 and 4, 2023, in the Evaluation and 21APR Data presentation.</p> <p>BFCO staff has communicated special conditions to subrecipients whose districts provide data on a quarterly basis and has collected supporting documentation from subrecipients.</p>	<p><i>(Completed October 2023 – Contact: Michael Miller)</i></p> <p><i>(Completed August 2023 – Contact: Shawn Youngblood)</i></p>

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		<p>released. Subrecipients who provide evidence that the school district of the target school which they serve does not provide monthly behavioral data, will receive special conditions for the months for which this data is not available.</p> <p>1. BFCO will ensure that all the required deliverables are provided by OCPS and are accepted prior to payment. Deliverables must be quantifiable, measurable, and verifiable. Each deliverable must be directly related to a task specified in the scope of work and must identify the minimum level of service to be performed.</p> <p>2. BFCO Program Staff will review all the required deliverables prior to authorizing payment.</p> <p>3. BFCO supervisors will conduct regular sample reviews of</p>	<p>BFCO will create a program folder for subrecipients requiring special conditions related to monthly deliverables.</p> <p>1. BFCO ensures that all required deliverables from OCPS are reviewed and approved prior to payment.</p> <p>2. BFCO Program Staff reviews all required deliverables for final approval prior to authorizing payment.</p> <p>3. BFCO supervisors are updating written Program Support Unit (PSU) standard operating procedures (SOP) that align with the Monitoring and Compliance Unit (MCU) SOP to include quality assurance sampling. BFCO supervisors conduct training to ensure there</p>	<p><i>In-Progress</i> Shawn Youngblood – (January 2024)</p> <p>1. <i>Completed</i> – Shawn Youngblood (August 2023)</p> <p>2. <i>Completed</i> – Shawn Youngblood (August 2023)</p> <p>3. <i>In Progress</i> – Shawn Youngblood (September 2024)</p>

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		<p>deliverables which have been approved by BFCO staff to ensure all criteria for the deliverables are being met. Additionally, BFCO will conduct regular training with staff to ensure there is a clear understanding of deliverable requirements needed for approval.</p> <p>4. BFCO will ensure that all submitted deliverables are reviewed in accordance with the Monitoring and Compliance Unit Standard Operating Procedures as well as the Program Support Unit Standard Operating Procedures. BFCO will also ensure that all deliverables are satisfactorily completed prior to authorizing payments.</p> <p><i>Anticipated Completion Date</i> The anticipated completion date is October 31, 2023.</p>	<p>is a clear understanding of deliverable requirements needed for approval.</p> <p>4. BFCO supervisors are updating the written PSU SOP to ensure that all submitted deliverables are reviewed in accordance with grant requirements.</p>	<p><i>4. In Progress – Shawn Youngblood (September 2024)</i></p>

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<p>The selected subrecipients did not submit all deliverables in a timely manner.</p>	<p>We recommend BFCO ensures that subrecipients submit all required deliverables timely and send reminders until they receive all required documentation. We also recommend that BFCO define the “participant data update” deliverable as behavioral referrals and in-school suspensions in the RFA and add the quarterly report card grades deliverable and the associated due dates in the RFA.</p>	<p>Management Response as of September 22, 2023</p> <p>BFCO concurs with the finding.</p> <ol style="list-style-type: none"> 1. BFCO has implemented a tiered internal and subrecipient checks and balances review process to support timely deliverables. 2. BFCO will remind subrecipients regarding financial consequences as outlined in the Request for Application (RFA) or Request for Proposal (RFP) if deliverables were not submitted by the deadline established by FDOE. 3. Moving forward, BFCO will specify the “participant data update” deliverable reporting element in the RFA and RFP. <p><i>Anticipated Completion Date</i> The anticipated completion date is September 30, 2023.</p>	<ol style="list-style-type: none"> 1. BFCO supervisors are updating written PSU SOP to include quality assurance sampling. 2. BFCO staff continue to remind subrecipients who are out of compliance about potential financial consequences for not meeting grant requirement deadlines, as outlined in their RFA and RFP. 3. BFCO updated the participant data information in the upcoming 2024-25 RFP and the Program Office will disseminate this information to continuing subrecipients at the beginning of the new grant year. 	<ol style="list-style-type: none"> 1. <i>In Progress – Shawn Youngblood (September 2024)</i> 2. <i>In Progress – Shawn Youngblood (August 2024)</i> 3. <i>In Progress – Shawn Youngblood (August 2024)</i>

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<p>BFCO did not always approve deliverables in a timely manner.</p>	<p>We recommend BFCO enhance its controls, including supervisory review of deliverable approval dates, to ensure staff reviews deliverables within the timeframe outlined by the grant terms.</p>	<p>Management Response as of September 22, 2023</p> <p>BFCO concurs with the finding. BFCO will update its policies and procedures to include frequent supervisory review of deliverable due dates and provide regular training for staff regarding the process and requirements of deliverables approval.</p> <p><i>Anticipated Completion Date</i> The anticipated completion date is October 31, 2023.</p>	<p>BFCO supervisors are updating the written PSU SOP to ensure all submitted deliverables are reviewed in a timely manner. The SOP will address frequent supervisory review of deliverable due dates and regular training for staff regarding the process and requirements of deliverables approval.</p>	<p><i>In Progress – Shawn Youngblood (September 2024)</i></p>

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The selected subrecipients did not submit all deliverables in a timely manner.	We recommend that subrecipients submit all required deliverables by the agreement due dates.	Management Response as of September 22, 2023 Concur. All deliverables were submitted. All deliverables were completed prior to this report.	We have hired a Data Base Research Assistant whose responsible for making sure all deliverables are submitted on time or before. Currently all are submitted .	<i>(Mark as Not Started, In Progress, or Completed and Insert Response)</i> Completed

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<p>Some OASAS deliverable submissions did not include all required reporting elements, and BFCO approved invoices for payment despite the missing deliverables.</p>	<p>We recommend OASAS submit all required deliverable reporting elements to BFCO in accordance with grant terms.</p>	<p>Management Response as of September 22, 2023</p> <p>Concur. The Data Use Agreement (DUA) between OASAS and Orange County Public Schools (OCPS) gains the required data points at the identified times determined by BFCO. The only exceptions are behavior referrals and suspensions are gained quarterly rather than the required monthly reporting and progress report data is not collected and disseminated by OCPS.</p> <p>Action Items:</p> <ul style="list-style-type: none"> • Replace requirement of Progress Report Data with an identified best practice to implement real time accommodations for student academic improvement. The 	<p><i>Orlando ASAS had procured a memo on October 11, 2023, from the Superintendent of Orange County Public School that determined that monthly data is not provided due to “limited personnel”. This memo was sent to BFCO for confirmation and clarity. BFCO directed Orlando ASAS to notify on its monthly deliverable checklist in the “comments/notes” section terminology stating that all data is received quarterly and uploaded accordingly.</i></p>	<p><i>Completed – October 2023 – Daniel Toffoli(Executive Director -ASAS), Sybil Rivers (PDS)</i></p>

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		anticipated completion date is October 31, 2023. • Change deliverable frequency of behavioral data points (referrals, suspensions from monthly to quarterly. The anticipated completion date is October 31, 2023.		
The selected subrecipients did not submit all deliverables in a timely manner.	We recommend that subrecipients submit all required deliverables by the agreement due dates.	Management Response as of September 22, 2023 Concur. Through a delay of reception of the Data Use Agreement between OASAS and OCPS partial data was uploaded by the deadline of the month’s deliverable date. Once complete data was gained, the data was uploaded again showing a delay on the date and time stamp on EZ reports. Action Items: • Ensure the DUA is acquired in a timely manner to upload data	<i>The Data Use Agreement received in August 2023, so quarterly data is received at the end of each marking period. Applicable data is uploaded within requested deadlines. Monthly meetings held with the PDS to discuss upcoming deadlines and tracking measures to ensure all requirements are met. All uploads are completed within determined parameters.</i>	<i>Completed – October 2023 - Daniel Toffoli (Executive Director – ASAS) – Sybil Rivers (PDS)</i>

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		within the determined deadlines. This matter is considered to be completed. <ul style="list-style-type: none">• Identify tracking and communication systems internally and/or through the EZ Reports platform to show all uploads regardless of the overwrite date/time stamp dynamic. The anticipated completion date is October 31, 2023.		