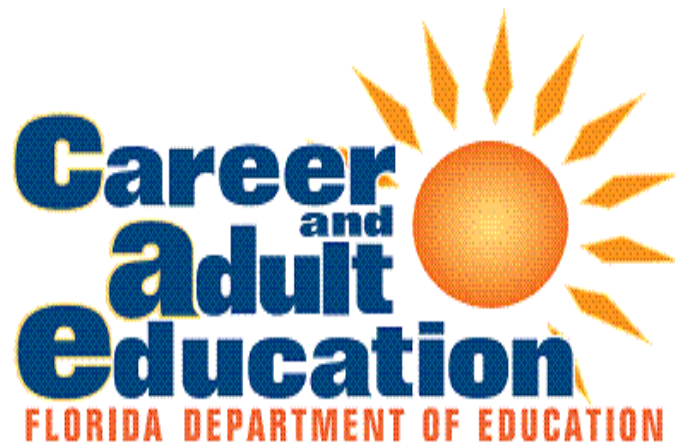# Florida Department of Education
Division of Career and Adult Education

2016-17

Quality Assurance and Compliance
Policies, Procedures and Protocols

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

12:59 PM
Date: 11/14/2016
Revision: Program of Study

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Module A

Division of Career and Adult Education
Quality Assurance and Compliance
Policies, Procedures and Protocols

SECTION 1 - GENERAL PROVISIONS

Purpose: The purpose of this section is to define the role, authority, philosophy, and support of the Division of Career and Adult Education's responsibility to design, develop and implement a comprehensive Quality Assurance and Compliance System including monitoring activities for its federal and state funded grants.

A WAY OF WORK

The Florida Department of Education (FLDOE), Division of Career and Adult Education (DCAE) in carrying out its roles of leadership, resource allocation, technical assistance, monitoring, and evaluation is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The Quality Assurance and Compliance section is responsible for the design, development, implementation and evaluation of a comprehensive system of quality assurance and compliance including monitoring. The role of the Quality Assurance and Compliance System is to assure financial accountability, program quality, and regulatory compliance. As stewards of federal and state funds, it is incumbent upon the division to monitor the use of career and technical education (CTE) and adult education (AE) funds in addition to the regulatory compliance of providers on a regular basis.

The monitoring component of the system is risk-based. Risk assessment is a process used to evaluate variables associated with the grants by assigning a rating for a provider's level of risk to the FLDOE. In order to complete a risk assessment, certain risk factors have been identified which may affect the level of risk for each provider. A Risk Matrix is completed for each provider that has received funding.

PURPOSE OF MONITORING

The purpose of monitoring is to identify the specific areas in which a provider is in compliance or non-compliance with federal law and regulations, state statutes and rules Uniform Grant Guidance (UGG), Federal Register Part III, Office of Management and Budget (OMB) 2 CFR Chapter 1, Chapter II, Part 200, et al. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule. The timely identification of non-compliance provides the Office of Management and Budget framework to make changes that are expected to result in programs becoming more efficient and effective. Addressing the providers' program performance is essential to the division's accountability system. A comprehensive and multi-dimensional Quality Assurance and Compliance System is a foundation for continuous improvement of services and systems both internally and externally. Our commitment to excellence supports accountability, collaboration, targeted technical assistance, continuous improvement, and positive systemic change.

AUTHORITY

The *Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014. This was the first legislative reform in 15 years of the public workforce system. In general, the rules and guidelines set forth by the WIOA will be effective on July 1, 2015. The 2015-2016 year served as a transition year for agencies receiving state and federal grant dollars. The WIOA will be executed during the 2016-2017 monitoring year. The State Unified Plans and Common Performance Accountability provisions take effect July 1, 2016. The U.S. Department of Labor (DOL) will issue further guidance on the timeframes for implementation of these changes.

Brustein, M., Wurzburg, B. K., Spillan, S., & Auerbach, E. (2014) The Administrator and Provider's Guide to the Adult Education & Family Literacy Act of 2014. Washington D.C: Brustein & Manasevit

The FLDOE receives federal funding from the United States Department of Education (USDOE) for Adult Education and Family Literacy under the Adult Education and Family Literacy Act of 1998 and for Career and Technical Education (CTE) under the Carl D. Perkins Career and Technical Education Act of 2006. FLDOE awards subgrants to eligible providers to administer local programs. FLDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for Career and Adult Education, as specified in Education Department General Administrative Regulations (EDGAR) 34 CFR § 76.770, the UGG § 200.328, § 200.501 audit requirements and § 215.86, Florida Statutes (F.S.).

UGG Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards § 200.100 Purpose, denotes uniform nature of standards and requirements for all Federal grants and cooperative agreements irrespective of entity type; removes explicit reference to Institutions of Higher Education (IHEs), hospitals, and other non-profit organizations.

UGG § 200.101 Applicability, Adds explicit reference to Indian Self-Determination and Education Assistance Act of (ISDEAA) as amended, 25USC 450-458 ddd-2, for tribal entities.

EDGAR Part 76 State Administered Programs. EDGAR 34 CFR part 76.1 "Programs to part 76 applies to each State-administered program of the Department. Pursuant to EDGAR 34 CFR 76.770, "A State shall have procedures to ensure compliance. Each State shall have procedures for reviewing and approving applications for subgrants and amendments to those applications, for providing technical assistance, for evaluating projects, and for performing other administrative responsibilities the State has determined are necessary to ensure compliance with applicable statutes and regulations."

UGG § 200.51 Grant Agreement – Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments § 200.51 establishes uniform administrative rules for federal grants and cooperative agreements and sub awards to state, local and Indian tribal agreements.

UGG § 200.328 "Monitoring and reporting program performance, (a) Monitoring by providers. Providers are responsible for managing the day-to-day operations of grant and subgrant supported activities. Providers must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Provider monitoring must cover such program, function or activity."

UGG - Federal Agencies and Pass-Through Entities § 200.513 Responsibilities require Federal awarding agencies to designate a Senior Accountable Official who will be responsible for overseeing effective use of the Single Audit tool and implementing metrics to evaluate audit follow-up. This section also encourages Federal awarding agencies to make effective use of cooperative audit resolution practices in order to reduce repeated audit findings.

§ 215.86, F.S., "Management system and controls- Each state agency and the judicial branch as defined in § 216.011, F.S., shall establish and maintain management systems and controls that promote and encourage compliance; economic, efficient, and effective operations; reliability of records and reports; and safeguarding of assets. Accounting systems and procedures shall be designed to fulfill the requirements of generally accepted accounting principles."

§1008.32, F.S., address the responsibility of the State Board of Education for oversight and enforcement relative to compliance. Title VI of the Civil Rights Act of 1964 [PL. 88-352]; Title IX of the Education Amendments of 1972 as amended [20 U.S.C. 1681-1683 and 1685-1686]; Section 504 of the Rehabilitative Act of 1973, as amended [29 U.S.C. 794]; Section 1000.05, Florida Statutes: "The Florida

Educational Equity Act"; Section 760.10, Florida Statutes: "Unlawful Employment Practices" Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act of 1990, Age Discrimination in Employment Act of 1967 and the Age Discrimination Act of 1972.

The Genetic Information Nondiscrimination Act (GINA) of 2008 prohibits discrimination on the basis of genetic information. Civil right compliance obligations are monitored by the following:

- Secondary and technical education centers operated by public school districts: The Office of Equal Educational Opportunity (OEEO); contact phone number: 850-245-9556
- Postsecondary public education institutions: The Office of Equity and Civil Rights Compliance (OECR), Division of Florida Colleges; contact phone number: 850-245-9468

The Project Application and Amendment Procedures for Federal and State Programs (Green Book at http://www.fldoe.org/grants/greenbook/)

Financial and Program Cost Accounting and Reporting for Florida Schools (Red Book at http://www.fldoe.org/finance/fl-edu-finance-program-fefp/financial-program-cost-accounting-repo.stml)

Uniform Administrative Requirements, Cost Principles and Audit Requirement for Federal Awards (2CFR Part 200 at http://www.ecfr.gov.cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpludit-requirements-for-federal-awards)

UGG Part 200, § 200.328 and § 200.331 Monitoring and reporting program performance. The non-Federal entity is responsible for oversight of the operations of Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring also must cover each program function or activity.

STRATEGIC IMPERATIVE
The FLDOE operates within the following guiding principles: a coordinated K-20 seamless system, student-centered, access, equity, academic excellence, and flexibility. Strategic focus areas within Florida's Next Generation PreK-20 Education Strategic Plan have also been developed to assist the Department in long range planning efforts. The Division of Career and Adult Education specifically addresses the following strategic focus areas:

1. Expand opportunities for postsecondary degrees and certificates.
2. Improve College and Career Readiness.

OPERATIONAL STANDARDS – ROLES AND RESPONSIBILITIES
The UGG Federal Agencies § 200.513, Responsibilities, requires that the FLDOE monitor the activities of providers to ensure that performance measures are achieved and federal funds are expended for authorized purposes. Monitoring will support compliance with federal laws and regulations, state statutes and rules, and the provisions of an approved grant award. A Quality Assurance and Compliance System includes various monitoring strategies such as: phone calls, emails, conference calls, webinars, grant application reviews, desk monitoring review activities, records reviews, targeted technical assistance, corrective action plans, onsite visits, verification and/or referrals for fiscal or data reviews.

Quality Assurance and Compliance staff is expected to coordinate and complete compliance and performance monitoring in accordance with the system requirements. Staff is required to render impartial

and unbiased judgments in the review of provider performance and compliance with the terms and conditions specified in the approved grant award, as well as applicable state and federal laws.

Quality Assurance and Compliance staff is expected to demonstrate, model, and reinforce the values of integrity, accountability, quality, urgency, responsiveness, personal responsibility, courtesy, collaboration and innovation. Staff will demonstrate these values at all times in their interactions with co-workers, supervisors, providers and other stakeholders; in their personal contributions to work assignments and projects; and when representing FLDOE.

SECTION 2 - IMPLEMENTATION FUNDAMENTALS

Purpose: The purpose of this section is to identify essential fundamentals of the implementation of the Quality Assurance and Compliance System. A statement of purpose will provide clarity regarding the goal of the specific component or monitoring activity.

GENERAL PROCEDURES

Each module has been developed to provide consistency and order to the application of the quality assurance and compliance activities as they are developed. For each component of the module, certain elements may be present.

Regulatory Authority: Protocols will be substantiated with the regulatory citation as appropriate.

Protocols: In order to substantiate compliance vs. non-compliance, protocols are developed to ensure consistent application of regulatory requirements. For example, the use of interview protocols, record review checklists or observation guidelines will support clear expectations and findings of fact. Forms and checklists are developed to ensure efficient monitoring processes.

Consistent Use of Terms: The sub-grantee or vendor will be referred to as the provider or agency in the contents of the monitoring papers. Other terms will be defined in applicable laws and regulations; excerpts are included in this document.

STAKEHOLDER INVOLVEMENT

The DCAE is committed to the inclusion of stakeholder involvement in the Quality Assurance and Compliance System. Participation of school districts, community colleges, state colleges and universities, government agencies, community/faith-based organizations, students and families and division staff ensures a dynamic and transparent system. As the Quality Assurance and Compliance System is developed and implemented, it will evolve based upon the input of stakeholders, in addition to implementation activities. The Advisory Council acts in an advisory capacity to ensure stakeholder participation in the quality assurance and compliance process; there is no approval authority. Final authority for decision-making lies with the division.

Quality Assurance Advisory Council: The Advisory Council may convene, in person or by phone, to review and give feedback regarding the Quality Assurance processes and tools. This workgroup may also assist in the review of data and trends to ensure meaningful development and revision of the system to identify the need for statewide systemic technical assistance activities, and assist in the evaluation of the system.

Focus Groups: Representatives associated with the grants awarded as a provider or student may be solicited from across the state to participate in periodic focus groups during the year. The focus groups may give input regarding a single issue or topic. Groups may be contacted to complete surveys via phone, email or mail. Focus groups may also be organized to meet during onsite visits.

Peer Monitors: Peer monitors can be an invaluable asset to the quality assurance process, especially monitoring. Persons from the field are nominated to participate in the monitoring process and bring a wealth of training and expertise to their assignment. Peer monitors may be used across disciplines and can be a key tool in times of shrinking resources.

Qualified persons from local providers, FLDOE and/or outside agencies may be recruited to participate in the monitoring processes with the FLDOE monitoring section. Use of peer monitors will increase monitoring resources, provide training on the monitoring process, and support an effective and efficient system. The division may implement a peer monitoring system.

PROFESSIONAL DEVELOPMENT

In order to ensure the consistent interpretation and application of the components of the Quality Assurance and Compliance System, it is crucial to provide training to internal and external customers. Training will be available to internal division staff. The participation of representatives of the grants administration and program areas is an asset to any monitoring process. Training will be available through various methods to ensure access for all interested parties.

Targeted providers designated to have an onsite visit or desk monitoring review within the monitoring year will receive training via webinar regarding the monitoring activities and procedures specific to the visit.

SECTION 3 - PROVIDER SELECTION

Purpose: The purpose of this section is to identify how providers are selected for specific monitoring strategies.

Various sources of data are used throughout the implementation of the Quality Assurance and Compliance System. The monitoring component of the system is risk-based. Risk Assessment is a process used to evaluate variables by assigning a rating to the provider for the level of risk to the FLDOE and the division. A Risk Matrix, identifying certain operational risk factors, is completed for each provider. The results of the Risk Assessment process and consideration of available resources are used to determine one or more appropriate monitoring strategies to be implemented.

Those agencies with high Risk Assessment scores will be monitored with consideration of the resources available. Unique circumstances may contribute to the addition or postponement of onsite monitoring or desk monitoring review for some agencies.

A provider who received an onsite monitoring visit in the previous year but reappeared as high risk on the risk assessment during the current monitoring year may be required to complete a desk monitoring review. Furthermore, a provider that required a follow-up on a resolution plan from the previous year onsite monitoring visit may also be required to complete a desk monitoring review.

Any monitoring strategy may be utilized up to and including, onsite or desk monitoring, if determined necessary by the chancellor or director or requested by other divisional leadership staff; such monitoring activity may be announced or unannounced.

Those agencies that were either monitored onsite or by desk monitoring review during a given year may not be subject to the same activity in two subsequent years. However, there are those agencies whose size may dictate monitoring by regions or geographic areas during successive years, such arrangements will be made with the individual provider.

In some cases, specifically with community and faith-based organizations (CBOs and FBOs) including Career and Technical Student Organizations (CTSOs), the evaluations of the risk factors result in similar scores. Therefore, such organizations may be evaluated on a periodic and/or cyclical basis as determined appropriate by the division. For onsite visits, agencies may be chosen to coincide with regularly scheduled travel or scheduled separately as determined by the director.

DATA REVIEW
The level of compliance and performance of services delivered by each provider requires continuous monitoring. Data is a key accountability tool used to measure past and present performance. The review of data is an integral part of the activities, which will support the appropriate monitoring strategy for selected service providers. Following are some of the data sources that may be used to assess a provider's performance:
- Grant Application including Assurances
- Project Disbursement Report (DOE 499 and 399)
- Florida Grants System (FLAGS)
- Project Amendment Request(s)
- Auditor General Audit Reports
- Community-Based Organizations' (CBO) Audit Reports
- National Reporting System (NRS) - Adult Education Annual Report

- Florida Education Training and Placement Information Program (FETPIP)
- Workforce Development Information System (WDIS)
- Career and Technical Education Annual Report - Consolidated Annual Report (CAR)
- CBO data system
- Program Improvement Plan (PIP), Perkins Performance Measures

LEADERSHIP CONTRACTS

Contracts that promote and support the providers of CTE and AE programs to enhance student performance will be monitored. Once targeted providers are identified for onsite or desk monitoring review, such support contracts may be included in scheduled activities. Should additional protocols be developed specific to these agencies, such protocols would be distributed prior to any monitoring activities. Alternative schedules may also be implemented. Such contracts include, but are not limited to, leadership grants, associations, and CTSO's.

SECTION 4 - RISK ASSESSMENT

Purpose: The purpose of a risk assessment is to identify the primary process used by the Quality Assurance and Compliance section to select Career and Adult Education providers for specific monitoring strategies.

Risk Assessment is a process used to evaluate variables by assigning a rating to the provider for the level of risk to FLDOE.

Risk Factors:
The risk assessment is based on an evaluation of certain risk factors related to the provider. The decisions to identify risk factors must take into account the accessibility, availability and relevance of the required data. The following are the risk factors that are currently being used:

1. Volume of Federal funds
   - Greater funding may entail greater risk.
   - The allocation of one million dollars carries significantly more risk than one thousand dollars.
2. Number of grants
   - The more grants a provider administers, the higher the risk.
3. PIP Index (for career and technical education)
   - Providers that are unable to meet the projected level of performance on specific indicators present higher risk than a provider that meets or exceeds the projected level of performance on specific indicators.
   - Providers having the same measure with a PIP over multiple years would yield greater risk than a provider with no PIP.
4. Organizational changes
   - A change in director during the previous two fiscal years may affect coordination and implementation of the grant.
   - A seasoned director presents less risk than one who is new to the responsibilities of the position.
5. Unexpended grant funds
   - A lack of internal controls and/or program issue must be considered.
   - The monies requested or allocated may not coincide with actual need.
6. History of audit findings
   - Consider the number of findings from three prior auditor general audits; negative findings indicate increased risk, repeated or uncorrected findings indicate even greater risk.

Risk Matrix:
The risk assessment tool, the Risk Matrix, uses predetermined risk factors to rank career and adult education grants and thus, identify targeted providers.
   - Specific risk factors are identified on the Risk Matrix;
   - A scale of specific criteria is established;
   - A value is assigned for each of the criteria;
   - The value is multiplied by the risk factor weight;
   - Results in a total number of points for the specific risk factor;
   - Using the summarized information, a quartile analysis is used to divide the allocations and to determine the point value used to calculate the risk scores; and
   - The points for each risk factor are totaled for a level of risk score for the agency.

The higher score indicates a greater level of risk. However, **A HIGH RISK ASSESSMENT SCORE SHOULD NEVER BE INTERPRETED AS A NEGATIVE REFLECTION ON THE PROVIDER.** The division will review specific risk factors, criteria scale, values and risk factor weights annually and make appropriate changes as needed.

Linking the Risk Assessment and the Monitoring Strategy:
The Risk Assessment process is used by the Quality Assurance and Compliance section to determine the monitoring strategy appropriate for each provider. Once a provider is linked to a specific monitoring strategy, then consideration of the current status of all career and technical and adult education funded grants in the geographic area may be reviewed. The review of the Risk Assessment process will be ongoing. Use of the Risk Assessment process does not limit the division's ability to monitor any provider or other contracts at any time.

The Quality Assurance and Compliance section 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. Although the Risk Assessment process is the primary means by which monitoring strategies are determined, it is not the only method that may be used. For example, to ensure the effective and efficient use of resources, there may be opportunities to evaluate and monitor other career and technical and adult education grants, providers or programs in the geographical area at the same time that targeted providers are monitored.

Module B

SECTION 1 - MONITORING STRATEGIES

Purpose: The purpose of monitoring strategies is to identify a continuum of activities that may be used by the Quality Assurance and Compliance section to monitor providers and to ensure quality assurance including performance and compliance.

The following activities may be used as monitoring strategies with a provider at any time during the monitoring process. The intensity, frequency and purpose of use may vary according to the monitoring strategy required for the provider. Various monitoring strategies may be utilized to ensure a comprehensive and multi-dimensional Quality Assurance and Compliance System. The Division is not limited to apply a specific strategy to any provider at any time.

Strategies include:

Phone Calls and Email: Communication occurs with a provider to engage in monitoring activities, including targeted technical assistance or, as a periodic reporting mechanism, through one or more phone calls or email.

Webinar: Various technologies may be used to conduct a webinar to complete monitoring and follow-up activities with the provider.

Records Review: Specific records and documentation are identified and requested to be submitted for a compliance review onsite or desk monitoring review. Selected records may include, but are not limited to, invoices, purchase orders, travel documents, equipment lists, personnel records, student records/data, technology plans and existing policies and procedures.

Technical Assistance: The DCAE or other designated parties provide services that will assist providers with program and fiscal accountability, program and data quality management, policies and procedures.

Onsite Visit: Monitoring activities are conducted onsite that may include the following: records review, observations, interviews, or other activities to perform a comprehensive review of compliance and program performance.

Verification: Activities are used to ensure the accuracy and consistency of the provider's performance, documentation, policies and procedures or data.

Desk Review: Activities include a review of the provider's grant implementation, supporting documentation, requested records, and conducting phone interviews and exit conference.

Program Improvement Plans/Action Plans/Corrective Action Plans (CAPs): Activities or strategies are developed by the provider to achieve program improvement and compliance.

Referral for Fiscal Review: A selected provider having one or more fiscal issues that do not constitute a finding may be referred to the Department of Education Grants Management or Comptroller's Office for further review or action.

Referral for Data Review: A selected provider having one or more data issues that do not constitute a finding may be referred for a data quality review within FLDOE.

SECTION 2 - MONITORING PROCESSES

Purpose: Compliance and performance monitoring provides FLDOE with information necessary to assess the fiscal and programmatic accountability of its providers. This section outlines the expectations for and activities of quality assurance and compliance monitoring.

Major Activities:
The following activities may be included as part of the monitoring process:
- Correspondence and notification
- *Entrance Conference
- *Interviews: administrative, instructors/teacher and students
- *Observations: classroom, campus and events
- Records review: administrative, program, personnel, financial and equipment inventory documentation
- Data verification
- Exit Conference
- Surveys
- Targeted technical assistance
- Development, review and follow-up of Corrective Action/Action Plans/Program Improvement Plans
- Verification and closure

Denotes activities not applicable to desk monitoring review

Communication: In order to ensure consistent communication between the FLDOE quality assurance and compliance section and the individual provider, guidelines for the communication process are established. By designating a provider contact and by setting timelines, each provider will be informed of the expectations for completing the specific tasks required to implement the monitoring processes effectively. The initial notification letter and final report will be addressed to the provider's agency head. All remaining written communications will be directed to the provider's designated contact person(s). Any exceptions or issues that arise from a monitoring strategy should be addressed with the director of Quality Assurance and Compliance.

Notification: Providers will be notified of a monitoring activity by a phone call from the director within a reasonable time of a scheduled activity. This call will be followed by written notification to the agency head. Additional phone calls will be held to coordinate the activity with the agency contact person and the monitoring team leader to ensure that the provider is informed of the monitoring components. Electronic mail is considered written notification when used.

Designation of Provider Contact: The provider designates a person to act as the primary contact for all monitoring functions. In some circumstances, two persons may be designated.

Designation of Quality Assurance and Compliance Team Leader: The director will designate a team leader for all monitoring functions, including onsite visits and desk monitoring reviews. The team leader is responsible for coordinating the logistics specific to a provider.

Quality Assurance and Compliance Section: The Quality Assurance and Compliance section is responsible for completing all monitoring activities.

Length of Monitoring Activity: The length of the visit may be determined by several factors including the number of grants to be monitored, the location(s) of the program(s), the complexity of the systems or documentation as well as available resources.

Communication Prior to Monitoring Activities: Following the Quality Assurance and Compliance Provider Training webinar, the designated team leader will conduct a phone call with the provider-designated contact person(s) to discuss the monitoring process.

The agency will be asked to provide any other information regarding its programs, policies and procedures, or geographic area that may influence activities during the monitoring process. Additional documents may need to be forwarded to the Quality Assurance and Compliance section prior to the monitoring review. Assistance will be provided to targeted providers regarding the monitoring policies, procedures, and protocols.

Entrance Conference: The Quality Assurance and Compliance section conducts an entrance conference with the provider's official representative(s) on the first day of the visit. The provider may invite other persons as appropriate. The provider may present an overview of its programs, services and systems which operate with the grant funds. The monitoring team leader describes the activities that will take place during the visit. The team leader may request records covering the monitoring period. The entrance conference provides an opportunity for both parties to review the schedule and work out any logistics that may contribute to an efficient and effective visit. This time also provides an opportunity for some general discussion among the Quality Assurance and Compliance section and the provider's representatives.

Interviews: Individual and/or group interviews will be conducted during the visit; however, during the course of the visit any agency personnel may be requested to participate in an interview. The provider is expected to make every effort to ensure that persons to be interviewed are available.

Onsite Visits to Locations: The format of the onsite visit at a location may vary depending on the size and programs available. When possible, section members will meet with a group of students participating in the programs, observe classrooms and conduct records reviews.

Daily Debriefing: The Quality Assurance and Compliance team leader may provide a debriefing to the provider's designated representative at the end of each day of monitoring. The team leader will discuss any issues or concerns found during the monitoring activities and address any provider concerns. This debriefing also enables the provider to locate any additional documentation that may be necessary to substantiate compliance.

Exit Conference: Upon the conclusion of the monitoring activity, an exit conference is held. An exit conference will be held in person for onsite providers and by phone for desk monitored providers. In attendance are members of the Quality Assurance and Compliance section and the provider's designated participants. The provider may invite other persons as appropriate. The purpose of the exit conference is to provide a summary of the general results and to discuss the provider's findings and concerns, if applicable. Conference calls may be used to facilitate an exit conference following an onsite visit. Requests for additional time to submit documentation following the exit conference must be approved by the director.

<u>Follow-up Activities</u>: The Quality Assurance and Compliance team leader is required to work with the provider, when applicable, to develop and ensure that the Resolution Plan is comprehensive, timely and completed. Additional monitoring or further requests for documentation may be implemented to ensure full compliance.

SECTION 3 - RESOLUTION ACTIVITIES

Purpose: Resolution activities identify those specific actions/strategies to be implemented by the provider that will address and resolve non-compliance findings, systemic issues, concerns and/or the lack of achievement with performance measures or indicators.

CORRECTIVE ACTION PLAN

Once the monitoring visit/review is completed, items of non-compliance are identified. In order to ensure the correction of those items, a Corrective Action Plan is developed. The Corrective Action Plan must identify the findings and the specific strategies the provider will implement to ensure corrective actions have been completed to achieve full compliance. Dates of completion are expected. All Corrective Action Plans must be approved by the director and/or the team leader.

ACTION PLAN

Within the results of the monitoring activity, concerns may be noted. Concerns focus on areas that need to be addressed to increase quality and minimize the potential for future findings. Such concerns are listed in the Action Plan; providers are required to address the concerns noted. Action Plans must be approved by the director and/or the team leader.

Components of Resolution Plan:
One form is used for all plans. The following components shall be included in each plan:
- A statement of the finding/concern
- Action(s) by the provider to address the finding/concern and ensure full resolution
- Person(s) responsible for implementation of the strategies
- Projected date of completion
- Targeted technical assistance

The designated Quality Assurance and Compliance team leader is required to work with the provider to ensure that the plan is comprehensive, timely and completed. Failure to develop or implement approved resolution plans may be addressed through additional monitoring strategies and/or enforcement activities. All findings and/or concerns must be resolved within one year of the plan being accepted and signed, unless approved otherwise by the director.

PROGRAM IMPROVEMENT PLAN

When a provider is unable to meet the projected level of performance on specific indicators for CTE Programs, a Program Improvement Plan is required. Division staff works to ensure consistency with the requirements, review, approval and follow-up of Program Improvement Plans.

TARGETED TECHNICAL ASSISTANCE

As areas of non-compliance are identified locally or across the state, targeted technical assistance may be provided to support full compliance and systemic change for program improvement. Targeted technical assistance addresses specific areas of identified need for an individual provider, a group of providers, or statewide, based on the frequency of the identified need. This need may be identified through federal or state reviews and/or audits that demonstrate repeated issues of non-compliance; thus, the need for systemic change. For example, targeted technical assistance may be provided statewide as a result of a monitoring finding to ensure that the resolution is consistently and adequately interpreted and addressed. Targeted technical assistance may be provided by the Quality Assurance and Compliance section, other division or FLDOE staff or through other sources outside the department.

SECTION 4 – ENFORCEMENT AND EVALUATION

Purpose: The purpose of enforcement and evaluation is to ensure the implementation of the elements associated with the Quality Assurance and Compliance System for the DCAE. Enforcement and evaluation activities are in place to ensure that grants and contracts are implemented in a timely and ethical manner, in full compliance with regulatory requirements, and to support the purpose and goals of the grant.

ENFORCEMENT ACTIVITIES

- Communication with Agency Heads and/or Governing Boards: Communication with governing boards may be required to focus on the need for immediate and systemic change to continue eligibility the receive grant funding.

- Regular Monitoring/Reporting: For providers that are required to complete a resolution plan, activities will be monitored on a regular basis until all actions are completed.

- Grant Conditions: Restriction(s) may be placed on a specific grant as a result of monitoring activities; conditions may include such actions as directed activities, structured spending and increased reporting.

- Funding Strategies: Actions taken in regard to the selected provider's funding may include a range of interventions from directed funding, change in method of reimbursement, or to delay or withhold funds.

- State Plans: The State Plans may address additional enforcement activities.

- General Assurances, Terms, and Conditions for Participation in Federal and State Programs: This document must be signed by all agencies and organizations that receive federal or state funds, and may address enforcement activities.

- The UGG § 200.338: This section addresses enforcement activities for remedies for noncompliance which may be applied to certain grants and § 200.207 specific conditions.

INVESTIGATIONS

In response to expressed concerns or complaints, both internal and external, investigations may be conducted in regard to grant(s) administration or implementation by providers. Such activities will be completed in concert with, and reported to, other department offices as appropriate.

CLOSEOUTS

Providers may be required to submit final reports and additional documentation upon the conclusion or termination of a grant.

The Closeout Review Process may address performance and financial reports, inventory and disposition of equipment, record retention and/or additional elements requested by the department, as referenced in the UGG § 200.16 and § 200.343.

EVALUATION SYSTEM

The purpose of an Evaluation System is to review the components and implementation of the Quality Assurance and Compliance System, including monitoring activities.

To support continuous improvement, the Quality Assurance and Compliance section will review any input that is given by stakeholders and providers monitored to make adjustments or changes to the system. As strategies and protocols are used, the section may identify changes that will improve the system. The system will be evaluated and revised as needed on an annual basis.

As the Quality Assurance and Compliance System is expanded over time, the processes and procedures used internally to administer grants and programs will be evaluated. Various tools may be used including evaluation tools accessible through federal agencies.

Module C

SECTION 1 – ADULT EDUCATION AND FAMILY LITERACY PERFORMANCE INDICATORS

Performance Outcomes:
Providers are ranked on the level of achievement on performance indicators specific to the programs of Adult Education and Family Literacy.

Adult Education and Family Literacy:
The Workforce Investment Act of 1998 (WIA) has been reauthorized by the Workforce Innovation and Opportunity ACT (WIOA), Adult Education and Family Literacy Act of 2014. The full implementation year begins in 2016-2017. Programs will use the WIA performance indicators for 2015-2016. State and local program administrators must establish a comprehensive accountability system to assess the effectiveness of agencies in achieving continuous improvement of adult education and literacy activities. The performance accountability system also assists in verifying the return on investment of the Federal funds in adult education and family literacy activities.

In the year 2000, with the help of state directors of adult education, indicators were developed for collecting information regarding the adult education student program participation and assessment of the impact of adult education instruction, methodologies for collecting measures, reporting forms, procedures, training and technical assistance to assist states in collecting the measures, by the National Reporting System (NRS). The accountability system for the federally funded adult program is mandated by the WIA. NRS is the national system for collecting the impact and outcomes of adult education and family literacy instruction.

Florida negotiates state performance targets for each Educational Functioning Level (EFL), except for Adult Secondary Education (ASE) High with the Office of Career, Technical and Adult Education (OCTAE) on an annual basis. Each eligible recipient is expected to achieve the state performance target for each EFL or show improvement towards that target. Achieving Florida's adult education state performance target will be based on each agencies accurate submission of student enrollment and completion data of EFL gains as reported in the NRS to calculate the completion percentages.

Each agency must, at a minimum, report data on all the EFL levels of ABE, ASE (except ASE High), and ESOL. However, each eligible agency may establish additional indicators of performance that it may wish to track in the administration and delivery of its programs.

EDUCATIONAL GAIN DEFINITIONS

ABE/ESL Levels - An educational gain for the ABE/ESL levels is defined as one student moving from one EFL to the next in a given content area during the project year based on the results from an approved NRS and Florida assessment instrument administered in a pre- and post-test. In NRS table 4 and 4b, a student is included in the cohort based on his/her lowest initial functioning level.

ASE Levels – An educational gain for ASE level completions, reportable in NRS Tables 4 and 4b, depend upon the ASE level;

- ○ ASE Low – Passing an approved Adult High School course; earning a standard high school diploma or GED® equivalency diploma.
- ○ ASE High – Earning a standard high school diploma or GED® equivalency diploma.

A participant is considered a completer if they have made one or more EFL gains in the program in which they are included in NRS table 4 and 4b, even if the gain was made in a different subject area than the lowest initial functioning level. For example, a student with an ABE Beginning Literacy in Mathematics and an ABE Beginning Basic Ed in Reading has a lowest functioning level of ABE Beginning Literacy. In NRS Table 4 and 4b, a participant would be considered a completer if they moved up an LCP in either mathematics or reading since both courses are reported under the same program number.

Program Improvement Plan
In a competition grant year, all awarded agencies are expected to meet at least 90% of the state performance targets or demonstrate improvement in each EFL. In continuing years, an Adult Education Program Improvement Plan (AEPIP) is required if the DCAE determines that a funded agency failed to meet at least 90% of the state performance target or demonstrated improvement for each functioning level from the agency's previous year completion rates. An AEPIP is required for each EFL that failed to meet the required standards, and is implemented starting in the second year of funding.

SECTION 2 – ADULT EDUCATION AND FAMILY LITERACY ASSESSMENT PROTOCOL

Provider:	Date:	Position Interviewed:	DOE Monitor:

Relevant sections of law and regulations: section 212 of AEFLA (Pub. L. 105-220), EDGAR 34 CFR part 462, Subpart D; and 34 CFR 76.770, UGG § 200.328, § 200.331, § 200.338; also see the current Adult Education Assessment Technical Assistance Paper

Discuss your intake and placement process for new students.
- Are students being placed within a program of instruction based on the lowest score obtained by the student in the respective skill area of the standardized assessment?
- Does your agency use the National Reporting System (NRS) Test Benchmarks for Educational Functional Levels (EFLs) Table, with the scale scores of each test, when placing students into programs and reporting student gains?

Assessments
- What standardized assessment instrument(s) does your agency use to pre- and post- test Adult Basic Education (ABE) students?
- Do you have a procedure to ensure that students registered in a course are pre-tested with a state-approved assessment within the first 12 hours of instructional activity?
- What standardized assessment instrument(s) does your agency use to pre- and post- test Adult English for Speakers of Other Languages (ESOL) or English Literacy and Civics (EL/Civics) students?
- Is there a procedure to use an alternative assessment instrument for placement of a student with disabilities if the standard assessment instruments do not accurately measure the student's ability? If so, what instrument(s) is (are) used for this purpose?
- Does your program follow the test administration guidelines in each Test Administration Manual furnished by the assessment's publisher, including timed testing?
- Are your testing administrators certified, if required?

Accommodations
- Is there a procedure for self-identification of disabilities and to provide accommodations for students with disabilities or other special needs who need to take assessments?
- What documentation do you require or accept for accommodations?
- What types of accommodations have been provided in your institution?
- Are accommodations ever refused? Why?

Test Materials and Security
• Are all test materials, including passwords, kept in a secure, locked storage before and after the administration of any assessment?
• Is there a procedure for documenting test security compromise incidents? If so, who should these incidents be reported to?
• Is there a procedure for the disposal of obsolete, damaged, and outdated assessment materials that will ensure the security of the assessment materials?
• Are all tests precisely accounted for and written documentation kept for each test?
Comments:

State Approved Assessment Instruments for Adult Education and Family Literacy

Provider:	Date:	Position Interviewed:	DOE Monitor:

DIRECTIONS: Identify which of the following state-approved standardized assessment instruments are used and administered by the agency.

Assessment Instruments	Agency administers	
Basic English Skills Test (BEST) Literacy or BEST Plus	☐ Yes	☐ No
Brigance Employability Skills	☐ Yes	☐ No
Brigance Life Skills	☐ Yes	☐ No
Comprehensive Adult Student Assessment System (CASAS)	☐ Yes	☐ No
Comprehensive Test of Adaptive Behaviors (CTAB)	☐ Yes	☐ No
GED Test	☐ Yes	☐ No
Kaufman Functional Adult Student Assessment System (K-FAST)	☐ Yes	☐ No
TABE Comprehensive Language Assessment System- English (TABE CLAS-E)	☐ Yes	☐ No
Tests of Adult Basic Education (TABE)	☐ Yes	☐ No
Life and Work Series (ELCATE and Adult ESOL Students)	☐ Yes	☐ No
General Assessment of Instructional Needs (GAIN)	☐ Yes	☐ No
Other- list _____	☐ Yes	☐ No

Statutory Authority: Adult Education and Family Literacy § 212, § 1008.405 F.S., § 1011.80 F.S., and Rule 6A-6.014, FAC.;
See the most current Technical Assistance Paper on Assessments (Assessment TA Paper)

Administration of Standardized Assessment Instruments for Adult Education and Family Literacy

Provider:	Date:	Position Interviewed:	DOE Monitor:

For Agencies Using Basic English Skills Test (BEST) Assessment Instruments, published by the Center for Applied Linguistics:

1. BEST Plus and BEST Literacy:
   a. Have the persons who administer these assessments completed all training requirements as directed by the Center for Applied Linguistics?
   b. Does the agency have a procedure that provides for determining when a student has completed 80 – 100 hours of instruction before administering a post-test? If so, what is the procedure?
2. BEST Literacy:
   a. Is the length of time for students to take the test stopped at one (1) hour?
   b. When post-testing, does the agency administer a different test form than the test form used for the pre-test?

For Agencies using Comprehensive Adult Student Assessment System (CASAS) Assessment Instruments, published by CASAS:

1. Have the persons who administer these assessments completed all training requirements as directed by CASAS?
2. Does the agency use only the CASAS Life and Work Series tests for assessing adult ESOL students?
3. Does the agency administer the CASAS Oral Screening as the first step in the assessment process of adult ESOL students?
4. Are both reading and listening skills assessments used for placement and progression of adult ESOL students?
5. Are tests of the same skill area used for pre- and post-testing adult ESOL students (listening pre-test to listening post-test and reading pre-test to reading post-test)?
6. Is the length of time for students to take the reading test stopped at one (1) hour?
7. Is the length of time for students to take the listening test stopped upon completion of the audio CD or computer-based listening test?
8. Is only the reading test score used to establish the student's initial EFL and any EFL completions?
9. Is the lower of the two test scores (listening and reading) used to select the appropriate instructional level for adult ESOL students?
10. Does the agency have a procedure that provides for determining when a student has completed between 70 – 100 hours of instruction before administering a post-test? If so, what is the procedure?
11. Does the agency require that any exception to administering a post-test to a student before 70 hours of instruction be approved by the program administrator?

For Agencies Using the Test of Adult Basic Education – Complete Language Assessment System – English (TABE CLAS-E) Assessment Instruments, published by CTB McGraw-Hill:

1. Have the persons who administer these assessments completed all training requirements as directed by CTB McGraw-Hill?
2. Does the agency administer the TABE CLAS-E Locator as the first step in the assessment process for adult ESOL students?
3. Are both reading and listening skills assessments used for placement and progression of adult ESOL students?
4. Are pre- and post-tests given to adult ESOL students using the same skill area (listening and reading)?

5.	Is only the reading test score used to establish the student's initial EFL and any EFL completions?
6.	Is the length of time for students to take the reading test stopped at twenty-five (25) minutes?
7.	Is the length of time for students to take the listening test stopped upon completion of the audio CD?
8.	Is the lower of the two test scores (listening and reading) used to select the appropriate instructional level for adult ESOL students?
9.	Does the agency have a procedure that provides for determining when a student has completed between 60 – 95 hours of instruction before administering a post-test? If so, what is the procedure?
10.	Does the agency require that any exception to administering a post-test to a student before 60 hours of instruction be approved by the program administrator?
Comments:	

Assessment Records Review for Adult Education and Family Literacy

Provider:	Date:	Position Interviewed:	DOE Monitor:

CASAS Instruments

Initials/NA	Document/Process	Comments
	CASAS – For ESOL students, oral screening form is administered for students with limited English proficiency (English Language Learners) before placement into the appropriate ESOL program.	
	CASAS - Post-tests are given using the same level as the pre-test, with an alternate form, or at a higher level, depending on pre-test scores.	
	CASAS - Pre- and post-tests are given using the same skill area (reading, listening, writing, or math).	
	CASAS - Reading skills assessments are being used for placement and progression of ESOL students. *(The listening skills assessment is used for guiding instruction only)*	

TABE

Initials/NA	Document/Process	Comments
	TABE - TABE locator is used and the proper level of TABE (E, M, D, or A) is used based on locator results.	
	TABE- Different versions of TABE are used if student is tested twice within six (6) months.	
	TABE- Use of TABE Forms 9 and 10.	

QUALIFICATIONS of persons administering standardized assessment instruments

Initials/NA	Document/Process	Comments
	List of agency persons administering TABE - randomly check list for certification(s) for completion of TABE training sponsored by FLDOE and McGraw Hill.	
	List of agency persons administering TABE - randomly check list for certification(s) for completion of TABE refresher training	

	sponsored by FLDOE and McGraw Hill within two years of the initial training and every two years after that to present.	
	List of agency persons administering BEST Plus - randomly check for completion of one day BEST Plus workshop.	

SECTION 3 – ADULT EDUCATION AND FAMILY LITERACY PROTOCOL

Provider:	Date:	Position Interviewed:	Monitor:

Grants and Contracts for Eligible Providers

Statutory Authority: Title II of the Workforce Innovation and Opportunity Act of 2014 (WIOA), Adult Education and Family Literacy Act (AEFLA), Section 231(a)-(e)

Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation

Grants and Contracts

1. How are funds made available to the agency under the AEFLA used to develop, implement and improve Adult Education and Literacy activities?

Required Local Activities (Some of these may be answered using the grant application.)

1. Which of the following services do you provide?
   a. Adult Education and Literacy services, including workplace literacy services?
   b. Family literacy services?
   c. English literacy and civics education programs?
2. Describe the agency's program(s) and services.

Special Rule

1. How does the agency verify that the adult education or English literacy students:
   a. Have attained 16 years of age?
   b. Are not enrolled or required to be enrolled in secondary school under state law?
      and who:
   c. Lack sufficient mastery of basic educational skills to enable them to function effectively in society?
   d. Do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education?
   e. Are unable to speak, read, or write the English language?
2. Does the agency use funding under this Act to provide family literacy programs, services, or activities for eligible students and their families?

Considerations

1. Career Source Local Workforce Development Board (LWDB) Alignment
    • Identify the region where services are offered and the priorities of the LWDB.
    • Describe how the agency utilizes funds in alignment with the CareerSource Local Workforce Development Board regarding employment, training, education, and supportive services that are needed by adult education students.
    • Describe the alignment between the activities and services conducted by the agency and the regional needs identified in the LWDB proposed local plan (Note: The LWDB comprehensive four-year plan July 1, 2016 - June 30, 2020), including details on the strategies and goals being utilized.
    • Describe how the agency promotes concurrent enrollment and methods of referral for coordinating partner services with the LWDB.
    • Provide specific details about shared cost activities and the resources used to support those costs (example: AEFLA funds cover the cost of the full-time adult education teacher and local board covers the cost of the classroom facility).
    • Provide a copy of the Memorandum of Understanding (MOU) agreement(s) with each LWDB.

2. Serving those most in need
    • How does the agency serve individuals in the community most in need of literacy services, including individuals who are low-income or have minimal literacy skills?
    • How does the agency recruit those most in need of basic literacy services?
    • Does the agency have the ability to serve eligible individuals with disabilities, including eligible individuals with learning disabilities?
    • Does the agency provide optional Family Literacy services? If so, describe how these services are delivered.

3. Past Effectiveness   • Provide information and supportive quantitative data that clearly demonstrates the program's past year's effectiveness in improving literacy skills of individuals, especially with respect to eligible individuals who have low levels of literacy or who are English language learners.

4. Intensity of Services
    • How does the agency ensure that its program is of sufficient intensity and quality and based on the most rigorous research available so that participants achieve substantial learning gains?
    • Where and how often do classes meet? For how long?
    • Where are classes located: schools, libraries, churches, community centers?

5. Effective Practices
    • Does the program use instructional practices that include the essential components of reading instruction (phonological awareness, phonics, fluency, vocabulary, and comprehension?
    • Are activities based on the best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice?

6. Use of Technology
• Describe how technology is used in the classroom for instruction; include how the teacher uses technology as a classroom tool and how students may be using technology to develop digital literacy skills or on their own for class work.
• Describe the adult education programs delivered through blended distance/classroom approach or solely distance education programs for the distance learner (provide the name of the distance education providers).
• Provide examples of how the adult education programs use of such technology, services, and systems lead to improved performance in the delivery of instruction.
7. Learning in Context
• How do the activities provide learning in real-life contexts to ensure that an individual has the skills needed to compete in the workplace and exercise the rights and responsibilities of citizenship?
• How do the program activities incorporate instruction and activities such as workplace preparation and technology to enhance the development of skills needed to enter the workforce, and transition to postsecondary education?
• What instructional strategies and materials are used to integrate reading, mathematics, and language skills with occupational content into the classroom curriculum?
8. Staffing
• What are the minimum qualifications for the teachers/instructors, counselors, and administrators delivering the program activities?
• Describe professional development activities, face-to-face or on-line mode available for full-time and part-time teachers/instructors, counselors, and/or administrators that will ensure consistent planning and implementation of high quality, career pathway programs.
• How does the agency ensure that staff are knowledgeable about adult education instruction, policies, procedures, and priorities?
9. Coordination
• How has the agency established and/or improved partnerships that create greater opportunities for adult learners to transition to postsecondary education and workforce training programs?
• Describe any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities.
• Describe the coordination with other available education, training, and social services resources in the community, for the development of career pathways.
10. Student Needs
• How does the agency offer flexible schedules to accommodate student needs?
• What services are provided to students (such as childcare, transportation, mental health services and career exploration and planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete the programs?   o What Federal, State, and local support services partnerships have been established in order to provide these services?

11. Management Information
• Does the program maintain a high-quality information management system that has the capacity to report measurable participant outcomes and to monitor program performance?
• Describe the agency's reporting accountability measures in place in order to maintain compliance with the reporting requirement of National Report System (NRS) and WIOA Performance Measures.
12. English Language Acquisition Programs
• How have the local communities demonstrated a need for additional English language acquisition programs and civics education programs?
• Describe the activities of the English language acquisition program.

Local Application

Statutory Authority: AEFLA, Section 232

1. Refer to the DOE 101 budget page(s) from your grant(s) and the Final Disbursement Forms (FA 499s). Did the agency expend funds as budgeted and/or amended?

2. Provide a description of any cooperative agreements that the agency has with other agencies, institutions, or organizations for the delivery of Adult Education and Literacy activities.

3. Provide a description of how the agency provides services in alignment with local plan under Section 108. Include information on how the agency promotes concurrent enrollment in programs and activities under Title I.

4. Provide a description of how the agency has met the State adjusted levels of performance described in Section 116(b)(3). Include information on how the agency collects data to report on such performance measures.

5. Provide a description of how the agency has fulfilled one-stop partner responsibilities as described in Section 121(b)(1)(A).

6. Provide a description of how the services provided that meet the needs of eligible individuals.

Local Administrative Cost Limits

Statutory Authority: AEFLA, Section 233

1. Do total local administrative costs (including planning, administration, personnel development, and interagency coordination) exceed the 5% administrative cap?

a.	If administrative costs exceed five percent, did your agency negotiate with FLDOE in order to determine an adequate level of funds to be used for non-instructional purposes?

Administrative Provisions

Statutory Authority: AEFLA, Section 241

1. How do you ensure that funds made available for Adult Education and Literacy activities are used to supplement and not supplant other State and local public funds expended for Adult Education and Literacy activities?

Programs for Corrections Education and Other Institutionalized Individuals

Statutory Authority: AEFLA, Section 225

1. Did the agency use AEFLA funds available under Section 222(a) (1) for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals?
    a. Which of these academic programs were provided?
        (i) Adult Education and Literacy activities?
        (ii) Special education as determined by the eligible agency (FLDOE)?
        (iii) Secondary school credit programs?
        (iv) Integrated education and training?
        (v) Career pathways?
        (vi) Concurrent enrollment?
        (vii) Peer tutoring?
        (viii) Transition to re-entry initiatives and other post-release services with the goal of reducing recidivism?
2. If the agency is using assistance provided under this section to carry out a program for criminal offenders in a correctional institution, how is priority given to serving individuals who are likely to leave the correctional institution within five years of participation in the program?
3. If the agency is serving criminal offenders (any individual who is charged with or convicted of any criminal offense), where are the programs or activities located:

a.	Prison?	e.	Detention center?
b.	Jail?	f.	Halfway house?
c.	Reformatory?	g.	Community-based rehabilitation center?
d.	Work farm?	h.	Other?

SECTION 4 – STATE LEADERSHIP ACTIVITIES – ADULT EDUCATION AND FAMILY LITERACY PROTOCOL

Provider:	**Date:**	**Position Interviewed:**	**Monitor:**

State Leadership Activities – In General

Statutory Authority: AEFLA, Sections 223(a)(1)-(2)

Directions: This form applies only to those agencies receiving AEFLA Leadership funding. Each eligible agency (FLDOE) shall use funds made available under the Adult Education and Family Literacy Act (AEFLA) section 222(a) (2) for one or more of the following adult education leadership activities. Did your agency use AEFLA Leadership funds to complete any of the following activities? Check **yes** or **no**. If the answer is **yes**, answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation. The monitoring section may request verification of deliverables and performance.

Required Activities Section 223(a)(1)

Interagency Coordination	☐ **YES**	☐ **NO**

1. How did your agency use AEFLA Leadership funds to align adult education and literacy activities with other core programs and one-stop partners to implement the strategies identified in Florida's Unified State Plan?
2. Did the coordination include the development of career pathways to provide access to employment and training services for individuals in adult education and literacy activities?

Professional Development Activities	☐ **YES**	☐ **NO**

1. How did your agency use AEFLA Leadership funds to establish or operate high quality professional development programs to improve the instruction provided?
2. Did professional development include the following:
   a. Instruction incorporating the essential components of reading instruction;
   b. Instruction related to the specific needs of adult learners;
   c. Instruction provided by volunteers;
   d. Instruction provided by state or local personnel; or
   e. Dissemination of information about models and promising practices?

Technical Assistance	☐ **YES**	☐ **NO**

1. How did your agency use AEFLA Leadership funds to provide technical assistance to eligible providers?
2. For what topics/issues was technical assistance provided?
   a. Reading;
   b. Writing;
   c. Speaking;

    d. Mathematics;
    e. English language acquisition programs;
    f. Distance Education; and/or
    g. Staff Training

3. Did your agency provide technical assistance to eligible providers as a one-stop partner to provide access to employment, education and training services?
4. Did your agency provide assistance in the use of technology to improve system efficiencies?
5. How does your agency determine if such training improves quality?

Monitoring and Evaluation of Quality and Improvement	☐ **YES**	☐ **NO**

1. How did your agency use AEFLA Leadership funds to support monitoring and evaluation of activities and the dissemination of information about models and proven or promising practices within the state?

Permissible Activities Sections 223(a)(2)

Literary Resource Centers	☐ **YES**	☐ **NO**

1. What literary resource centers are within your region?
2. How did your agency use AEFLA Leadership funds to support literary resource centers within your region?

Instructional Technology	☐ **YES**	☐ **NO**

1. How did your agency use AEFLA Leadership funds to support the use of instructional technology?
2. Did your agency use AEFLA Leadership funds to develop and implement:
    a. Technology applications;
    b. Translation technology; and/or
    c. Distance education, including professional development?

Developing and Disseminating Curricula	☐ **YES**	☐ **NO**

1. How did your agency use AEFLA Leadership funds to develop and disseminate curricula?
2. Did this curricula incorporate:
    a. Phonemic awareness;
    b. Systematic phonics;
    c. Fluency; and/or
    d. Reading comprehension?

Education and Training	☐ **YES**	☐ **NO**

1. How did your agency use AEFLA Leadership funds to develop content and models for integrated education and training and career pathways?

Program Development	☐ YES	☐ NO
1. How did your agency use AEFLA Leadership funds to develop and implement programs that achieve the statewide objectives and measure the progress of those programs?		
Linkages with Postsecondary Institutions	☐ YES	☐ NO
1. How did your agency use AEFLA Leadership funds to develop and implement a system to assist in the transition from adult education and family literacy to postsecondary education? 2. How did your agency use AEFLA Leadership funds to promote linkages with a postsecondary program?		
Integration and Promoting Linkages	☐ YES	☐ NO
1. How did your agency use AEFLA Leadership funds to promote integration of literacy instruction and occupational skills training? 2. How did you promote linkages with employers? Please explain.		
Workplace Adult Education and Literacy	☐ YES	☐ NO
1. How did your agency use AEFLA Leadership funds for activities to promote workplace adult education and literacy activities?		
Curriculum Frameworks	☐ YES	☐ NO

1. How did your agency use AEFLA Leadership funds to identify curriculum frameworks?
2. How did your agency align curriculum framework with:
   a. State adopted academic standards;
   b. The current adult skills and literacy assessments used throughout the state or outlying area;
   c. The primary indicators of performance described in section 116
   d. Standards and academic requirements for enrollment in nonremedial, for-credit courses in postsecondary educational institutions or institutions of higher education supported by the state or outlying area; and/or
   e. The content of occupational and industry standards widely used by business and industry in the state or outlying area.		

Quality and Retention	☐ YES	☐ NO
1. How did your agency use AEFLA Leadership funds to develop and pilot strategies for improving teacher quality and retention?		
Disabled Learners	☐ YES	☐ NO
1. How did your agency use AEFLA Leadership funds to develop and implement programs and services to meet the needs of adult learners with learning disabilities or English language learners? 2. How did your agency identify the needs and capture the gains of such students at the lowest achievement levels?		

Outreach	☐ **YES**	☐ **NO**
1. How did your agency use AEFLA Leadership funds to provide outreach to instructors, students, and employers?		

State Leadership Activities – Collaboration

Statutory Authority: AEFLA, Section 223(b)

Directions: This section applies only to those agencies receiving AEFLA Leadership funding. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.

Collaboration	☐ **YES**	☐ **NO**
1. In using AEFLA Leadership funds, how did your agency collaborate where possible, and avoid duplication of effort in order to maximize the impact of the activities described above?		

SECTION 5 – ADULT EDUCATION AND FAMILY LITERACY DATA PROTOCOL

Data Foundation and Structure
1. Does your agency have written procedures for collection, verification, analysis, and reporting of student data? 2. What procedures are in place for tracking students following participation in the agency's program(s)? 3. How does your agency use the data that it collects? 4. Are student gains ever measured by a checklist rather than a state-approved assessment instrument?
Data Collection and Verification
1. Does your agency use an electronic management information system (MIS), used by all programs, that has individual student records within a relational database structure? 2. Does your agency have specific staff (positions) with clear responsibility for data collection, data entry, and data verification? What are these staff positions? See a position description. 3. What is the role of the Adult Education director in verification of data? 4. How is student attendance tracked and reported in your data system? 5. How often is data entered into the agency's MIS system? 6. Who has the responsibility of correcting missing and erroneous data reported to you by the state? Is program staff involved in this process?
Data Analysis and Reporting
1. Do you regularly access your agency's data? 2. How is data used for program management and improvement? 3. How do you share data results with your staff?
Staff Development
1. Has agency staff been provided training on general NRS requirements, including assessment policy and procedures? If so, which staff members receive this training? 2. Discuss the type of training provided for specific staff addressing data collection, data entry, and the production and/or interpretation of reports. 3. Has training been provided on conducting follow-up survey or data matching procedures to your staff? 4. Has agency staff received training on distance education policy and use of proxy hours, if estimated? 5. Which staff members participate in MISATFOR and WEDDAC meetings? (districts and colleges)

DATA VERIFICATION

DATA - Student Records Review – Adult Education
Directions: Student folder(s) will be randomly selected to review corresponding MIS data for selected students. Include students for whom performance was claimed in a specified grant year. This requires a printout or other proof of the students who contributed to the agency performance for the grant(s) during the given year. Initial only those items reviewed and make comments as necessary.

Initials/ NA	Document/ Process	Comments
	Attendance is captured in agency MIS and matches information in student folder.	
	Individual student subtest reports in student folders match student test data from MIS data system.	
	Placement in classroom instructional level is determined by pre-test results.	
	EFL (Educational Functioning Level) level gains matches the student testing results found in the student folder, MIS results reported for the student, and grants printout or other documentation of which students performed under AEFLA grant.	
	Subsequent test report indicates variance of the form of the test from the previous form given (for example, M9 then M10).	
	Subsequent test level is determined by previous test scores.	
	Student class work is based upon assessment results.	

Module D

SECTION 1 – CAREER AND TECHNICAL EDUCATION PERFORMANCE INDICATORS

Section 113 of the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) establishes and supports the development of a state and local accountability system that will assess the effectiveness of the state and local funding recipients in achieving progress in career and technical education (CTE). State-developed performance measures must consist of the core indicators listed below, any additional valid and reliable indicators that the state determines, and the "state adjusted levels of performance" for the indicators. These levels of performance must be expressed in percentage or numerical form and require continual improvement in the performance of CTE students. Information regarding the performance measures must be included in the State Plan. The revised State Plan for Florida is submitted to the U.S. secretary of education annually.

The Division of Career and Adult Education will negotiate State Adjusted Levels of Performance for each core indicator with the (USDOE), Office of Career, Technical, and Adult Education (OCTAE). Local recipients must accept the state negotiated levels of performance or negotiate with the state for new levels for each of the core indicators.

Each state must submit a report to the secretary each year regarding the state's progress in achieving its performance levels, including the performance of special populations. The state must identify and quantify gaps in performance between groups of students, and describe the progress of these students. The state report is a compilation of reports sent to the state by local recipients.

The Division of Career and Adult Education has developed accountability guidelines and operational procedures for secondary and postsecondary performance measures. These guidelines are reviewed annually and major changes in operational procedures are vetted with Management Information System (MIS) reports coordinators during standing meetings of FLDOE Community College Technical Center Management Information Systems.

Operational guidelines and procedures for secondary level measures, postsecondary-college credit measures, and postsecondary-adult level measures can be found at http://fldoe.org/academics/career-adult-edu/funding-opportunities/carl-d-perkins-career-technical-edu/carl-d-perkins-resources.stml.

Florida's 2016-2017 State Performance Targets are as follows:

Secondary Level
1S1 Academic Attainment in Reading = 68.00%
1S2 Academic Attainment in Math = 63.00%
2S1 Technical Skill Attainment = 88.00%
3S1 School Completion = 95.68%
4S1 Student Graduation Rates = 87.50%
5S1 Placement = 81.78%
6S1 Non-traditional Participation = 40.02%
6S2 Non-traditional Completion = 95.22%

Postsecondary Certificate Level (Clock Hour)
1A1 Technical Skill Attainment = 84.00%
2A1 Completion = 60.25%

3A1 Student Retention or Transfer = 57.06%
4A1 Student Placement = 76.77%
5A1 Non-traditional Participation = 12.22%
5A2 Non-traditional Completion = 47.35%

Postsecondary College Credit Level
1P1 Technical Skill Attainment = 46.50%
2P1 Completion = 49.00%
3P1 Student Retention or Transfer = 71.00%
4P1 Student Placement = 86.50%
5P1 Non-traditional Participation = 22.29%
5P2 Non-traditional Completion = 27.65%

Program Improvement Plan
If the Division of Career and Adult Education determines that an eligible recipient has failed to achieve at least 90 percent of an agreed-upon local adjusted level of performance for any of the core indicators of performance described in section 113(b)(4) of the act, the eligible recipient will be required to develop and implement a Program Improvement Plan for that core indicator to be implemented during the first program year succeeding the program year for which the eligible recipient failed to meet the agreed upon local adjusted level of performance for that indicator. Beginning with the 2010-11 grant award year, PIPs are required as a component of the Request for Application.

In developing a program improvement plan, the eligible recipient must consult with the Division of Career and Adult Education and appropriate agencies, individuals, and organizations in accordance with 113(b)(4)(C)(ii)(11) of the act.

Section 113(b) (4) (C) (ii) (II) of the act: Identify and quantify any disparities or gaps in performance between any such category of students and the performance of all students served by the eligible recipient under this act.

Categories of students disaggregated by race, ethnicity, gender, disability status, migrant status, English proficiency, and status as economically disadvantaged.

Section 1111(b) (2) (C) (i) (v) include separate measurable annual objectives for continuous and substantial improvement for each of the following:
> (1) The achievement of all public elementary school and secondary school students.
> (2) The achievement of:
>> (aa) economically disadvantaged students;
>> (bb) students from major racial and ethnic groups;
>> (cc) students with disabilities; and
>> (dd) students with limited English proficiency

SECTION 2 – CAREER AND TECHNICAL EDUCATION PROGRAM IMPROVEMENT PLAN PROTOCOL

Local Program Improvement Plan
Statutory Authority: Perkins IV, Section 123(b)
Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.

1. Was your agency required to develop and implement a Program Improvement Plan(s) (PIP)?
    a. Which measure(s) is addressed in the agency's PIP(s)?
    b. Describe how performance gaps for different categories of students were addressed.
    c. What agencies, individuals and organizations did your agency consult with to develop and/or implement the plan(s)? *See grant application.*
2. How will the agency evaluate its outcomes as specified in its strategic plan?
3. Can the agency verify the implementation of the strategies proposed in the PIP(s)?
4. Has progress been made on meeting targets for this measure(s)?
5. If no progress has been indicated, what adjustments to the PIP(s) were/will be made?
6. What budget expenditures were included to support strategies to address performance on this measure(s)?
 	
*Note: The grant budget should identify specific expenditures related to performance targets; verify expenditures.
 	
An individual protocol, developed prior to the visit will also address the performance improvement plan(s). See *Perkins Program Improvement Plan (PIP) Review* protocol

Local Plan for Career and Technical Education Programs
Statutory Authority: Perkins IV, Section 134
Directions: Response or verification should be provided in the space following the inquiry; spaces will expand to accommodate explanation.
1. Describe how the CTE programs required under Section 135(b) (required use of funds) will be carried out with funds under this title.
2. Describe how the CTE education activities will be carried out with respect to meeting state and local adjusted levels of performance established under Section 113.

3. Describe how the eligible recipient will:
    a. Improve the academic and technical skills of students by strengthening the academic and CTE components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE Programs to ensure learning in (i) the core academic subjects and (ii) career and technical education subjects;
    b. Provide students with strong experience in, and understanding of, all aspects of an industry;

	c. Ensure that students who participate in such CTE programs are taught to the same coherent and rigorous content aligned with challenging academic standards as are taught to all other students; and, d. Encourage CTE students at the secondary level to enroll in rigorous and challenging courses in core academic subjects.
4.	Describe how the agency's key stakeholders are involved in the development, implementation and evaluation of CTE programs and how such individuals and entities are effectively informed about and assisted in understanding the requirements of this title including CTE programs of study.
5.	Provide assurances that the CTE program is of such <u>size, scope and quality</u> to bring about improvement in the quality of CTE programs. See Form DOE 900E, provided in the RFA for further delineation of size, scope and quality for each Program of Study. *See Application Narrative Part B* **Size** Requirements: Small Program _____ Medium Program _____ Large Program _____ (Check One) a. Agency included required documentation on each chart to verify that programs provide students with the opportunities to become CTE concentrators. **Scope** Requirements: Agency included required documentation on each chart to verify that programs: a. Provide students with opportunities for dual enrollment or articulated credit options; and, b. Are aligned with business and industry. **Quality** Requirements: Agency included documentation on each chart to verify that programs a. Provide students with the opportunity to earn industry certification or licensure; b. Offer students the opportunity to participate in high-skill, high-wage or high demand programs; and c. Ensure academics are an integral component of Perkins IV funded CTE programs.
6.	Describe the process used to **evaluate and continuously improve performance** of CTE programs.
7.	Include a description of how the agency will: a. Review CTE programs, and identify and adopt strategies to overcome barriers that result in lowering rates of access to, or lowering success in, the programs for **special populations**; b. Provide programs that are designed to enable the special populations to meet the local adjusted levels of performance; and c. Provide activities to prepare special populations, including single parents and displaced homemakers, for **high-skill, high-wage or high-demand occupations** that will lead to self-sufficiency.
8.	Describe the agency's efforts to ensure that **special populations will not be discriminated** against based on their status as members of special populations.
9.	Describe how funds will be used to promote preparation for **non-traditional fields.**
10.	Describe how **career guidance and academic counseling** will be provided to CTE students, including linkage to future education and training opportunities.

11. Describe efforts to improve:
   a. **recruitment and retention** of CTE teachers, faculty, and career guidance and academic counselors,
   b. including individuals in groups underrepresented in the teaching profession; and
   c. **transition** to teaching from business and industry.

Local Use of Funds - Requirements for Uses of Funds

Statutory Authority: Perkins IV, Section 135

Directions: Response or verification should be provided in the space following the inquiry; spaces will expand to accommodate explanation.

Funds made available to eligible recipients under this part **shall** be used to support career and technical education programs that ensure the following:

Integration of academics with CTE programs
1. How do you integrate academics with CTE?
2. How often does this integration occur?
3. Do you have a common lesson planning time for CTE and academic teachers?

Link CTE at the secondary and postsecondary level: Primary Program of Study (POS) Review

All agencies receiving Perkins funding are required to implement at least one Program of Study (Primary POS) each project year that meets all eight (8) state-required elements and was developed and is being fully implemented through a collaborative effort between secondary, postsecondary and business partners during that project year. **The following questions are designed to ask about how your agency developed, is implementing and evaluating this specific POS and the performance of students in this POS**. You will also be asked whether you can assure that each of the eight state-required elements are in place for this POS during the current project year.

Please respond to the following questions using a narrative format and if needed, provide SUMMARY materials/information that are specific only to the Primary Program of Study (14-15 Primary POS) that you submitted with your 2014-15 RFA. If you do send data or information generated from your local data system on the 14-15 Primary POS, please send ONLY aggregated data or lists without student names and/or identifiers.

Name of Primary POS:
one submitted with your 2014-2015 Perkins Request for Application

Please respond using a narrative format and respond based on your 14-15 Primary POS only.

1. How did your agency:
   a. Identify this POS? What partners were involved?
   b. Develop this POS? What partners were involved?
   c. Implement this POS? What partners were involved?

d. Promote this POS? What partners were involved?
e. Develop articulation agreements for this POS? What partners were involved?
f. Develop the POS sequence of courses from grade 9 through postsecondary? What partners were involved?
g. Ensure that this POS reflects local economic and workforce needs? What partners were involved?
h. Ensure that this POS provides a pathway to earn industry certification/relevant work skills? What partners were involved?
i. Review and update/revise this POS? What partners were involved?

2. Current Program Implementation of the 2014-15 Primary POS: **You can respond in a narrative format or provide ONLY <u>aggregated</u> data without student names and/or identifiers for items (c) and (d).**
   a. Is the program currently being FULLY implemented?
   b. How long has the full program of study been in place?
   c. What is the current enrollment for this POS?
   d. How successful have students been in this POS (e.g., technical skill attainment, retention, completers, percentage passing certification exams, placement (2012-13 completers) *could use data from the 2014-15 Local Level Data Report supplied by FLDOE*)?

Required supporting information: Can be summarized in narrative format. For student data and information: Summarize in narrative form or provide ONLY aggregated data without student names and/or identifiers for items (c) and (d).
a. 2014-15 Program of Study form submitted with 14-15 Perkins RFA (14-15 Primary POS)
b. Provide information on advisory group for this POS during the 2014-2015 project year; e.g., affiliation of members, meeting agendas, meeting minutes
c. Provide enrollment data on this Program of Study from the 2014-2015 project year, including concentrators and completers
d. **If possible**, evidence of success of students in this POS from 14-15 data, which would be placement data on completers from the 2012-13 project year (could be from Perkins Measures for Placement: 5S1, 4A1, and/or 4P1, which are based on FETPIP data on 12-13 graduates – see Local Level Data Report supplied by the FDOE)
Primary POS Compliance with the Eight Florida Required Program of Study Elements (2014-2015 RFA's POS)
Required Elements and How Provided by Agency and Evidence Elements in Place

1. Includes at least one articulation agreement (can be statewide or local agreement) for postsecondary education or training that outlines articulated credit students can earn by taking one or more of the courses in this program, by completing the program, and/or by earning the certification(s) linked to this program	☐ **YES**	☐ **NO**

Required supporting information:
   a. Articulation agreement(s) relevant to the 14-15 Primary POS;

 Additional supporting information: **Can be summarized in narrative format.**
   b. When was the last time that the 14-15 Primary POS was reviewed/updated?

c. How do you determine if your students were awarded appropriate clock hours/credits based on this articulation agreement? Do you have any kind of follow-up to ensure students receive appropriate clock hours/credits at the partner institution?		
2. Addresses local area need based on local economic conditions (based on local economic trend data), were on the TOL/ROL list, or was recommended by local workforce advisory board	☐ **YES**	☐ **NO**

Examples of possible supporting information to forward (submit at least 1):
   a. TOL list from year program was developed OR
   b. Local data used to decide to develop program OR
   c. Written request from local business/workforce board/chamber to develop program or meeting minutes to show request at advisory council meeting OR
   d. Notes from meeting between staff and business with request to develop the program		

3. Falls into one of the Florida 17 Career Clusters	☐ **YES**	☐ **NO**
a. Make sure Career Cluster on the 14-15 Primary POS form is one of the 17 career clusters on the Division's website		
4. Is included on the list of programs on the FLDOE curriculum frameworks webpages (http://fldoe.org/academics/career-adult-edu/career-tech-edu/curriculum-frameworks)	☐ **YES**	☐ **NO**
a. Make sure that program is listed under the Division's 2016-17 programs and curriculum frameworks on the website. If the program has been daggered or revised since the 14-15 project year, please note that here.		
5. Centers around a sequence of relevant, rigorous, locally required core academic courses as well as the required CTE courses	☐ **YES**	☐ **NO**

This is asking for evidence that there is academic alignment between CTE and academic courses and that both core sequences are equally rigorous.
 	
Examples of possible supporting information to provide (submit at least 1):
   a. Evidence of meetings and/or co-planning with academic faculty for the POS between the two levels and/or among faculty at each level (meeting agendas and/or meeting minutes) OR
   b. POS Form or other materials that outline required academic courses specific to this POS – that particular core academic courses, such as science, math or English are required for this POS – like specific math courses for Engineering pathways or specific science courses for Biotechnology program or Nursing Assistant program		

6. Includes required CTE secondary or PSAV courses that are part of the required sequence for that POS, as outlined in the FLDOE curriculum frameworks for that program and recommended performance standards for AS/AA degree programs	☐ **YES**	☐ **NO**

Examples of possible supporting information to forward (submit at least 1): Can be summarized in narrative format.
   a. Course schedules for 14-15 to indicate courses offered – <u>without any student and/or faculty identifiers</u> OR
   b. Narrative describing how courses are structured around FDOE frameworks/standards		

7. Offers rigorous CTE Courses that prepare students for program-related certification exams	☐ YES	☐ NO

Examples of possible supporting information to forward (submit at least 1): Can be summarized in narrative format or provide ONLY aggregated data without student names and/or identifiers.
    a. Any available local data on industry certifications earned by students in this POS during the 2014-2015 project year OR
    b. Data from Perkins Technical Skill Attainment Measures 2S1, 1A1, and/or 1P1 (see Local Level Data reported for this program supplied by the FDOE)		

8. Provides coursework that prepares students for specific postsecondary program options, offered at local/regional institutions, that a student could move into once completing the particular secondary program	☐ YES	☐ NO

Examples of supporting information (submit at least 1): Can be summarized in narrative format or provide ONLY aggregated data or lists without student names and/or identifiers for item (b).
    a. Provide a statement from faculty in the POS of a postsecondary partner validating that students in the secondary portion of this POS are prepared to move into the postsecondary program(s) identified in this POS OR
    b. Data that shows students admitted to related postsecondary program(s) or successful completion of introductory courses in the POS		

Other Recommended/Optional Elements		
1. Offers students opportunity to participate in a career and technical student association relevant to that program (http://fldoe.org/core/fileparse.php/7521/urlt/CareerTechStudentOrg.pdf)	☐ YES	☐ NO

Examples of supporting information (submit at least 1): Items (b), (c) or (d) can be summarized in narrative format or provide ONLY aggregated data without student names and/or identifiers.
    a. Meeting agendas OR
    b. Number of student members OR
    c. Number of students attending Conference OR
    d. Number of students competing at conference and summary of outcomes		

2. Offers students opportunities for program–related internship/work experience	☐ YES	☐ NO

Examples of supporting information (submit at least 1): Can be summarized in narrative format or provide ONLY aggregated data/summary information without student names and/or identifiers.
    a. Agreements with businesses for student work experiences OR
    b. Numbers of students participating and where placed		

Students have strong experience in and understanding of all aspects of an industry, which may include work-based learning experiences. 1. How do you provide students with strong experience in and understanding of all aspects of industry? What work-based learning experiences do you offer?		
Develop, improve, or expand the use of technology in career and industries 1. What training in use of technology is provided to CTE teachers/instructors, faculty and administrators?		

2. Is distance learning included with the training? 3. How do you provide academic and CTE skills for students that lead to entry into technology fields? 4. How do you encourage schools to collaborate with technology programs to offer voluntary internships or mentoring including programs that improve the mathematics and science knowledge of students?

Provide professional development programs
1. Describe how comprehensive professional development programs are offered for CTE teachers/instructors, administrators, counselors, etc., to address effective practices/teaching including in-service and pre-service training regarding:
    a. CTE and academic integration, provided jointly with academic teachers/instructors to the extent practicable
    b. Skills based on research that includes promising practices
    c. Practices to improve parental and community involvement
    d. Scientifically-based research and data to improve instruction
    e. Programs to ensure that those persons involved in the direct delivery of educational services to CTE students remain current in all aspects of industry
    f. Internship programs that provide relevant business experience
    g. Effective use and application of technology to improve classroom instruction

Develop and implement program evaluations 1. How do you develop and implement evaluations of the CTE programs? 2. How do you assess that the needs of special populations are being met?
Initiate, improve, expand, and modernize quality career and technical education programs, including relevant technology 1. What steps are taken to initiate a quality CTE program? 2. If need is indicated, how do you implement improvement or expansion of programs? 3. How are program updates accomplished? 4. How do you include relevant technology in the above-mentioned activities?
Provide services and activities that are of sufficient size, scope, and quality to be effective See also Local Plan Section 135.
Preparing special populations, including single parents and displaced homemakers, for high skill, high wage, or high demand occupations that will lead to self-sufficiency 1. How do you prepare special populations enrolled in CTE programs for high-skill, high-wage or high-demand jobs? 2. What accommodations or modifications are made for students with disabilities? 3. What activities are used to prepare single parents and displaced homemakers for these jobs? 4. Give an example that illustrates these efforts.
Local Uses of Funds - Permissive **Statutory Authority:** Perkins IV, Section 135(c)(1-20)

Directions: If your grant indicates that Perkins funds will be used for any of the 20 permissive uses of funds, mark a "Y" (Yes) in the left column. Answer the following questions for the permissive criterion (a) of the 20 that apply. Response or verification should be provided in the space following the inquiry; spaces will expand to accommodate explanation. If funds are not used for the described purpose, mark "N" (No).

How are Perkins funds being used to:

1. Involve parents, businesses, and labor organizations in the design, implementation, and evaluation of CTE programs?

2. Offer career guidance and academic counseling for students participating in CTE programs to improve graduation rates, provide information postsecondary and career options, and provide assistance to postsecondary students and adults who are changing careers or upgrading skills?

3. Fund local education and business partnerships, including work-related experiences for students, adjunct faculty arrangements for qualified industry professionals, and industry experience for teachers/instructors and faculty?

4. Provide programs for special populations?

5. Assist career and technical student organizations?

6. Provide mentoring and support services?

7. Lease, purchase, upgrade, or adapt equipment, including instructional aids and publications (including support for library resources) designed to strengthen and support academic and technical skill attainment?

8. Assist teacher preparation programs that address the integration of academics and CTE and assist persons interested in becoming CTE teachers/instructors and faculty, including persons with experience in business and industry?

9. Develop and expand postsecondary program offerings at times and in formats that are accessible for all students, including distance education?

10. Develop initiatives that facilitate the transition of sub-baccalaureate CTE students into baccalaureate degree programs, including—
    a. Articulation agreements between sub-baccalaureate degree granting CTE postsecondary educational institutions and baccalaureate degree-granting postsecondary educational institutions
    b. Postsecondary dual and concurrent enrollment programs
    c. Academic and financial aid counseling for sub-baccalaureate career and technical education students that informs
        the students of the opportunities for pursuing a baccalaureate degree and advises the students on how to meet any transfer requirements; and
    d. Other initiatives:
        (i)   to encourage the pursuit of a baccalaureate degree
        (ii) to overcome barriers to enrollment in and completion of baccalaureate degree programs, including geographic and other barriers
        (iii) affecting rural students and special populations

11. Provide activities to support entrepreneurship education and training?

12. Improve or develop new CTE courses, include the development of programs of study for consideration by the FLDOE and courses that prepare individuals academically and technically for high-skill, high-wage, or high-demand occupations and dual or concurrent enrollment opportunities?

13. Develop and support small, personalized, career-themed learning communities?
14. Support family and consumer science programs?
15. Provide CTE programs for adults and school dropouts to enable them to complete secondary education or upgrade technical skills?
16. Assist persons who have participated in services and activities under the act in continuing their education or training or finding an appropriate job?
17. Support training and activities, such as mentoring and outreach, in nontraditional fields?
18. Provide support for training programs in automotive technologies?

19. Pool a portion of such funds with a portion of funds available to not less than one other eligible recipient for innovative initiatives, which may include:
     a.   Improving the initial preparation and professional development of career and technical education teachers/instructors, faculty, administrators, and counselors;
     b.   Establishing, enhancing, or supporting systems for:
         (i)   accountability data collection under this Act; or
         (ii)   reporting data under this Act;
     c.   Implementing career and technical programs of study described in section 122(c)(1)(A); or
     d.   Implementing technical assessments,

20. Support other CTE activities consistent with the purposes of the Perkins IV

Voluntary Selection and Participation   **Statutory Authority:** Perkins IV, Section 314
Directions: Response or verification should be provided in the space following the inquiry; spaces will expand to accommodate explanation.
1. How does your agency ensure that secondary school students are not required to choose or pursue a <u>specific</u> career path, major, or major area of interest?
2. How does your agency ensure that students are not required to participate in a CTE program?
Limitation for Certain Students   **Statutory Authority:** Perkins IV, Section 315
Directions: Response or verification should be provided in the space following the inquiry; spaces will expand to accommodate explanation.
1. What is the earliest grade of CTE students that benefit from Perkins IV funding?
2. If equipment purchased with Perkins IV funds benefits students in CTE programs earlier than the seventh grade, under what circumstances does this occur?

SECTION 3 – CAREER AND TECHNICAL EDUCATION STATE LEADERSHIP ACTIVITIES PROTOCOL

State Leadership Activities - Required uses of funds **Statutory Authority:** Perkins IV, Section 124 (b)(1)-(9)	
Directions: This form applies only to those agencies receiving Perkins Leadership funding. If your agency used Perkins IV Leadership funds to complete any of the following activities, check "**yes or no**." If the answer is "**yes**," answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.	

From amounts reserved under Perkins IV, section 112(a) (2), each eligible agency (FLDOE) shall conduct State leadership activities as listed below. Grants are awarded to eligible recipients (State government agencies, CBOs, CTSOs, colleges and universities, etc.) to carry out one or more of the required activities for FLDOE.		
Assessment of Career and Technical Education Programs	☐ **YES**	☐ **NO**
1. How do you assess CTE programs carried out with Perkins IV funds? 2. How do you determine that the needs of special populations as defined in Perkins IV, section 3(29) are being met? 3. How do you assess that CTE programs enable special populations as defined in Perkins IV, section 3(29) to meet state adjusted levels of performance and prepare the special populations as defined in Perkins IV, section 3(29) for further education, further training, or for high-skill, high-wage or high-demand occupations?		
Develop, Improve, or Expand the Use of Technology in CTE	☐ **YES**	☐ **NO**
1. How does your agency provide training for CTE teachers, faculty, counselors, and administrators in the use of technology, including distance learning? 2. How does your agency provide CTE students with the academic and career and technical skills (including math and science knowledge that provides a strong basis for such skills) that lead to entry into technology fields, including non-traditional fields? 3. What encouragement do you offer to schools to collaborate with technology industries to offer voluntary internships and mentoring programs?		
Professional Development Programs	☐ **YES**	☐ **NO**

1. How did your agency provide in-service and/or pre-service training in CTE programs that focused on effective:
    a. Integration and use of challenging academic and CTE instruction provided jointly with academic teachers to the extent practicable?
    b. Teaching skills based on research that includes promising practices?
    c. Practices to improve parental and community involvement?
    d. Use of scientifically-based research and data to improve instruction?
2. Were the professional development programs high quality, sustained, intensive, and classroom-focused to positively impact classroom instruction and teacher performance (not one-day or short term workshops or conferences)?
3. How will the programs help teachers and personnel to improve student achievement to meet state adjusted performance levels?
4. How did the professional development support programs for public school CTE-related personnel ensure they:
    a. Stay current with industry needs, expectations, and methods?
    b. Effectively develop rigorous and integrated academic and CTE curriculum jointly with academic teachers, to the extent practicable?
    c. Develop a higher level of academic and industry knowledge and skills in CTE?
    d. Effectively use applied learning?
5. How did you coordinate with the teacher certification or licensing and professional development activities the state carries out under Title II of the Elementary and Secondary Education Act of 1965 and Title II of the Higher Education Act of 1965?	

Integration	☐ **YES** ☐ **NO**

1. How did your agency improve the academic and career and technical skills of students enrolled in CTE by strengthening the academic and career and technical components of CTE programs, through integrating coherent and relevant content with challenging academic standards and relevant CTE, to ensure achievement in:
    a. Core academic subjects as defined in Section 9101 of No Child Left Behind Act, including English, reading or language arts, math, science, foreign languages, civics and government, economics, arts, history and geography?
    b. Career and technical education?	

Preparation for Nontraditional Fields	☐ **YES** ☐ **NO**
1. How did your agency provide preparation for nontraditional fields in current and emerging occupations and other activities that expose students, including populations as defined in Perkins IV, Section 3(29), to high-wage occupations?	
Supporting Partnerships	☐ **YES** ☐ **NO**
1. How did your agency support partnerships among local education agencies, institutions of higher education, adult education providers, and, as appropriate, other entities, such as employers, labor organizations, intermediaries, parents, and local partnerships to enable students to achieve state academic standards and career and technical skills or complete CTE programs of study?	
Serving Individuals in State Institutions	☐ **YES** ☐ **NO**

1. How did your agency serve individuals in state institutions, such as state correctional institutions and institutions that serve individuals with disabilities? Where were these programs located?		
Programs for Special Populations	☐YES	☐NO
1. How did your agency support programs for special populations that lead to high-skill, high-wage or high-demand occupations?		
Technical Assistance	☐YES	☐NO
1. How did your agency provide technical assistance for eligible recipients?		

State Leadership Activities - Permissive uses of funds

Statutory Authority: Perkins IV, Section 124 (c)(1)-(17) and (d)

Directions: If your agency used Perkins IV Leadership funds to complete any of the following activities, check **YES** or **NO**. If the answer is **YES**, answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.

Improve Career Guidance and Academic Counseling	☐YES	☐NO

1. How did your agency use Perkins IV Leadership funds to improve career guidance and academic counseling programs that help students make informed academic and career and technical education decisions, including:
     a. Encouraging secondary and postsecondary students to graduate with a diploma or degree?
     b. Exposing students to high-skill, high-wage occupations and non-traditional fields?		

Establish Agreements between Secondary and Postsecondary CTE Programs	☐YES	☐NO
1. How did your agency use Perkins IV Leadership funds to establish agreements, such as articulation agreements, between secondary school and postsecondary CTE programs to provide postsecondary education and training opportunities for students participating in those career and technical education programs?		
Support Transition Initiatives	☐YES	☐NO

1. How did your agency use Perkins IV Leadership funds to support initiatives to help sub-baccalaureate CTE students transition into baccalaureate degree programs, including:
     a. Statewide articulation agreements between CTE postsecondary educational institutions that grant associate degrees and postsecondary educational institutions that grant baccalaureate degrees?
     b. Postsecondary dual and concurrent enrollment programs?
     c. Academic and financial aid counseling?
     d. Other initiatives?		

(i) To encourage the pursuit of a baccalaureate degree? (ii) To overcome barriers to participation in baccalaureate degree programs, including geographic and other barriers affecting rural students and special populations?		
Support for Career and Technical Student Organizations	☐ **YES**	☐ **NO**
1. How did your agency use Perkins IV Leadership funds to support career and technical student organizations (CTSOs), especially efforts to increase the participation of students who are members of special populations identified in Perkins IV, Section 3(29)?		
Support for Public Charter Schools	☐ **YES**	☐ **NO**
1. How did your agency use Perkins IV Leadership funds to support public charter schools operating CTE programs?		
All Aspects of an Industry	☐ **YES**	☐ **NO**
1. How did your agency use Perkins IV Leadership funds to support CTE programs that offer experience in, and understanding of, all aspects of an industry for which students are being trained?		
Support for Family and Consumer Sciences Programs	☐ **YES**	☐ **NO**
1. How did your agency use Perkins IV Leadership funds to support family and consumer sciences programs?		
Support for Partnerships between Education and Business	☐ **YES**	☐ **NO**
1. How did you use Perkins IV Leadership funds to support partnerships between education and business or business intermediaries, including cooperative education and adjunct faculty arrangements at the secondary and postsecondary levels?		
Support New or Improved CTE Courses and Initiatives	☐ **YES**	☐ **NO**
1. How did you use Perkins IV Leadership funds to support the improvement or development of new CTE courses and initiatives, including career clusters, career academies, and distance education, that prepare individuals academically and technically for high skill, high wage, or high demand occupations?		
Incentive Grants	☐ **YES**	☐ **NO**

Did you use Perkins IV Leadership funds to award incentive grants to eligible recipients?
    a. For exemplary performance in carrying out programs under this act, based on:
        (i) Eligible recipients exceeding the local adjusted levels of performance established under section 113(b) in a manner that reflects sustained or significant improvement?
        (ii) Eligible recipients effectively developing connections between secondary education and postsecondary education and training?
        (iii) Adoption and integration of coherent and rigorous content aligned with challenging academic standards and technical coursework?
        (iv) Eligible recipients' progress in having special populations identified in section 3(29) of Perkins IV who participate in CTE programs meet local adjusted levels of performance?		

(v) Other factors relating to the performance of eligible recipients under the Perkins IV as the Florida Department of Education determines are appropriate b. If an eligible recipient elects to pool funds with one or more other eligible recipients for innovative initiatives?			
Support Entrepreneurship	☐ **YES**		☐ **NO**
1. What activities does your agency provide that support entrepreneurship education and training?			
Provide CTE Programs that Coordinate with Adult Education Programs	☐ **YES**		☐ **NO**
1. How does the agency provide CTE programs for adults and school dropouts to complete their secondary school education that coordinate, to the extent practicable, with adult education and family literacy activities authorized under the Adult Education and Family Literacy Act?			
Providing Transition Assistance to CTE Participants	☐**YES**		☐ **NO**
1. What assistance does the agency provide to individuals, who have participated in services and activities under Perkins IV, to continue their education or training or find appropriate jobs, such as through referral to a one-stop center established under the Workforce Investment Act?			
Assessments	☐**YES**		☐ **NO**
1. How does the agency develop valid and reliable assessments of technical skills?			
Data Systems	☐**YES**		☐ **NO**
1. Has the agency developed and enhanced data systems to collect and analyze data on secondary and postsecondary academic and employment outcomes?			
Staff Recruitment and Retention	☐**YES**		☐ **NO**

1. What steps has the agency taken to improve:
    a. The recruitment and retention of CTE teachers, faculty, administrators, and career guidance and academic counselors, including individuals in groups underrepresented in the teaching profession; and
    b. The transition to teaching from business and industry, including small business?			

Support for Occupational and Information Resources	☐**YES**		☐ **NO**
1. How does the agency support occupational and employment information resources, such as those provided under section 118 of Perkins IV?			
Restriction on Uses of Funds	☐**YES**		☐ **NO**
1. How did the agency ensure that these funds were not used to fund administrative costs?			

SECTION 4 – CAREER AND TECHNICAL EDUCATION – DATA AND ASSESSMENT PROTOCOL

Provider:	Date:	Position Interviewed:	Monitor:

Career and Technical Education Data and Assessment

Statutory Authority: Perkins IV, Section 113; Section 1004.91 and 1008.405 F.S.; 6A-6.014, Florida Administrative Code (FAC);

Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.

Data Foundation and Structure

1. List the assessments currently used by your agency.
2. Has agency staff been trained in the administration and security of these assessments?
3. Do you have basic skills requirements for entry into the program?
4. Are students assessed within six (6) weeks after entry into the program?
5. Does your agency have written procedures for collection, verification, analysis and reporting of student data?
6. Does your agency have written procedures for collection, verification, analysis and reporting of Perkins data, based on the Perkins Business Rules?
7. What procedures are in place for tracking students following participation in the agency's CTE program(s)?
8. Do you follow Florida's Curriculum Frameworks for program hours, teacher certifications and basic skills exit requirements?
9. What process does the agency use for collecting and reporting data on student progress consistent with the Florida CTE curriculum frameworks (including occupational completion points earned)?
10. What process does the agency use for collecting and reporting data for career certificates, diplomas, or degrees awarded?
11. Do you have a local policy on exemptions for students with disabilities?
12. How does your agency use the data that it collects?
13. What process does the agency use for collecting and reporting data for industry certification, assessments reported for technical skills, licensures, and assessments reported for technical skills attainment? Does the process follow Perkins Business Rules?

Data Collection and Verification

1. Does your agency use an electronic management information system (MIS), used by all programs, that has individual student records within a relational data base structure?
2. Does your agency have specific staff (positions) with clear responsibility for data collection, data entry and data verification? What are these staff positions? Provide position descriptions for each.
3. How does your agency capture data relating to industry certifications or technical skill attainments by third-party assessment that the student has taken, and whether or not the student passed?
4. What is the role of the CTE director/coordinator in the verification of data?
5. How is student attendance tracked and reported in your data system?

6. How often is data entered into the agency's MIS system?
7. Who has the responsibility of correcting missing and erroneous data reported to you by the state? Is program staff involved in this process?

Data Analysis and Reporting

1. How often do you access your agency's data and verification reports provided by CCTCMIS and Florida College System?
2. Which staff is able to readily access and print data reports?
3. How is data, including Perkins performance data, used for program management and improvement?
4. How do you share data results with your staff?

Staff Development

1. Has agency staff been provided training on general assessment and data requirements, including assessment policy and procedures, follow-up policies? If so, which staff members receive this training?
2. Are guidance counselors and advisors trained on CTE requirements, Perkins Programs of Study, basic skills requirements, basic skills exemptions, student with disabilities exemptions, industry certifications etc.?
3. Which staff members receive training on data collection and/or data entry procedures?
4. Which staff members receive training on how to produce and/or interpret reports produced by the MIS?
5. Has training been provided to your staff on conducting follow-up survey or data-matching procedures?
6. Has agency staff received training on distance education policy and use of proxy hours, if estimated?
7. Which staff members participate in MISATFOR and WEDDAC meetings? (districts and colleges)

DATA VERIFICATION

DATA - Student Records Review – Career and Technical Education

Directions: Student folder(s) will be randomly selected to review corresponding MIS data for selected students. Include students for whom performance was claimed in a specified grant year. This requires a printout or other proof of the students who contributed to the agency performance for the grant(s) during the given year. Initial only those items reviewed and make comments as necessary.

Initials/ NA	Document/ Process	Comments
	Attendance is captured in agency MIS and matches information in student folder	
	Individual student subtest reports in student folders match student test data from MIS data system	
	Subsequent test report (if any) indicates variance of the form of the test from the previous form given (for example, M9 then M10)	
	Subsequent test level (if any) is determined by previous test scores	
	Student portfolio	
	Checklist	
	Occupational completion point attainment	

	Career certificate (including post-secondary career certificates in colleges)	
	Career diploma	
	Career degree (colleges only)	
	Industry certification or technical skill attainment by third party assessment	
	End-of-course or end-of-program assessment	

Module E

SECTION 1 – FINANCIAL MANAGEMENT SYSTEM PROTOCOL

Provider:	Date:	Position Interviewed:	Monitor:

Financial Management System

Statutory Authority: <u>UGG - Post Federal Award Requirements Standards for Financial and Program Management. § 200.300 Statutory and National Policy Requirements</u>

Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.

Financial Reporting
1. Does your agency have fiscal policies and procedures that include standard accounting practices, budgeting, and documenting and reporting procedures?
2. How do you monitor your grant expenditures?
3. How do program and fiscal managers coordinate their activities so information can be shared?

Accounting records
1. What process does your agency use to maintain detailed accounting records?
2. How are your accounting, procurement and inventory management systems linked to minimize problems?

Internal control
1. What controls are in place to protect technology and equipment acquired with federal funds?
2. How do you assure that property is used solely for authorized purposes?

Budget control
1. What process is in place for reconciling budgeted amounts with actual expenditures where payments to you are based on expenditures and performance?

Allowable cost
1. Which staff positions have responsibility for approving expenditures (purchases) under the grant?
2. How do you ensure that expenditures are "reasonable, allowable and allocable"?

Source documentation
1. How do you document various accounting transactions (payroll, purchases, etc.)?

SECTION 2 – FISCAL PROCUREMENT AND CONTRACTS PROTOCOL

Provider:	Date:	Position Interviewed:	Monitor:

Procurement (including purchasing and contracting)

Statutory Authority: UGG; Procurement Standards § 200.317, Procurement by states, § 200.322 Procurement of recovered materials, § 200.318 General procurement standards, § 200.319 Competition, § 200.326 Contract provisions

Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.

Procurement Procedures
1. Explain the procurement procedures for purchasing equipment using grant funds. How are purchase requests processed?
2. Explain the procurement procedures for contracting for goods or services using grant funds. (if applicable)
3. Do you have a contract manager?

Deliverables
1. What internal controls are in place to guarantee that contracts contain clear deliverables?
2. How does the agency know when deliverables are completed?
3. Does the system ensure that contractors submit written invoices according to the schedule outlined in the contract or when deliverables are completed?

Code of standards of conduct
1. How does the provider ensure that staff is aware of the information contained in the code of standards of conduct and abide by it?
2. Have there ever been violations of the provider's code of ethics? If so, how were they handled?
3. What procedures does the agency have to assure that persons procuring services do not have a conflict of interest in selecting, awarding, or administering the contract?

Purchasing
1. How does the provider practice economical purchasing? Does the provider have agreements in place to maximize purchasing potential? Elaborate.
2. What is the provider's purchasing process for items less than $1,000.00? More than $5,000.00?
3. How does the provider purchase computers? Classroom supplies such as pencils?

Contracts
1. How does the provider ensure that it has entered into contracts with entities that have not been suspended or debarred from participating in contracts supported with Federal funds?
2. How does the agency monitor the contract performance?
3. Invoices provide sufficient documentation to support the payment request.
4. How does the provider handle disputes with a contractor?
5. Was FLDOE notified of any disputes? If so, how? Have any disputes have gone to a due process hearing?
6. If travel was reimbursed, is reimbursement consistent with state travel requirements?

Records
1. Does the provider maintain records sufficient enough to detail the history of a procurement?
2. Do these records include such items as: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price?

Competition
1. How does the provider ensure full and open competition in procurement transactions?
2. Are there written procedures in place for procurement transactions?

Methods of procurement to be followed
1. Which methods does the agency use to procure goods and services with Federal funds? (Small purchase procedures, sealed bids, competitive proposals, or noncompetitive proposals?)

Contracting with small and minority firms, women's business enterprise and labor surplus area firms
1. What steps does the agency take to encourage participation in the contract process by small and minority businesses and women's business enterprises?

Contract cost and price
1. What documentation of cost and/or price analyses that were done for the last three contracts awarded by the agency can you provide?

Awarding agency review – Sample documentation
1. Can you provide all documents for the entire cycle of the procurement process for the last three procurements made by the agency? Would you have examples of a competitive procurement sealed bids, noncompetitive proposals, or small purchase procedures?

Bonding requirements
1. How do you ensure that construction or facility improvement contractors are adequately bonded or have filed payment or performance bonds with the Clerk of Court?

Contract provisions
1. What is your process for ensuring that contracts that are funded with Federal money include the contract provisions required by this section of the OMB UGG; §200.326 Contract provisions.

Contracting with faith-based organizations
1. What steps does the agency take to encourage participation by faith-based organizations in the contract and/or procurement process?
2. How do you ensure that inherently religious activities are kept separate from contracted programs/services?

SECTION 3 – FISCAL EQUIPMENT PROTOCOL

Provider:	Date:	Person Interviewed:	Monitor:

Fiscal – Equipment

Statutory Authority: <u>UGG, Equipment § 200.33, § 200.12, § 200.20, § 200.48, § 200.58, § 200.89, § 200.94, § 200.313, and § 200.439,</u> Equipment and other capital expenditures

Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.

Use

1. How does the agency use the equipment that was purchased with grant funds?
2. Is equipment assigned to specific personnel or departments or rooms?
3. Is the equipment ever used for other projects or programs? How does this work?
4. When the agency needs to replace equipment, what is done with the old equipment?

Management requirements

1. What staff position is responsible for equipment?
2. Is there a reasonable system in place to track the purchase, use, and disposal of equipment?
3. Describe the process used to inventory equipment. How often does the agency conduct a physical inspection of equipment?
4. Does the agency's inventory contain the required elements? (see equipment checklist)
5. Does the provider reconcile any discrepancies between current and previous inventory at least every two years? When was this last done?
6. Where is equipment stored? Is there a system in place to safeguard/secure equipment? Describe this system.
7. Have there been any reports of loss, damage or theft in the last 12 months? If so, how were they handled?
8. Who is responsible for the maintenance of equipment? Discuss the current maintenance procedures?

Disposition - Federal equipment - Right to transfer title

1. How does the agency dispose of equipment acquired under a grant that is no longer needed for the original project or program?

SECTION 4 – ALLOWABLE COSTS PROTOCOL

Provider:	Date:	Position Interviewed:	Monitor:

Directions: Did your Agency spend federal grant funds on any of the selected items below?
Check **YES, NO or N/A**. If the answer is **YES**, to any of the selected items below, answer the question for the selected item in the Fiscal Allowable Costs section.

Selected Item of Cost	YES	NO	N/A	Selected Item of Cost	YES	NO	N/A
Advertising and public relations costs				Membership subscriptions and professional activity costs			
Advisory councils				Organization costs			
Alcoholic beverages				Participant support costs			
Alumni activities				Plant and security costs			
Audit costs and related services				Pre-award costs			
Bad debts				Professional service costs			
Bonding costs				Proposal costs			
Commencement and convocation costs				Publication and printing costs			
Compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits)				Rearrangement and conversion costs			
Contingency provisions				Recruiting costs			
Deans of faculty and graduate schools				Relocation costs			
Defense and prosecution of criminal and civil proceedings and claims				Rental costs of real property and equipment			
Depreciation and use allowances				Royalties and other costs for the use of patents and/or copyrights			
Donations and contributions				Scholarships and student aid costs			
Employee health and welfare costs				Selling and marketing costs			
Entertainment costs				Specialized service facilities			
Equipment and other capital expenditures				Student activity costs			
Fines, penalties, damages and other settlements				Taxes			
Fund-raising and investment management costs				Termination costs applicable to sponsored agreements			

				Training costs			
Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of federal programs							
General costs of government				Transportation costs			
Goods or services for personal use				Travel costs			
Housing and personal living expenses				Trustees			
Idle facilities and idle capacity (unused capacity of partially used facilities)							
Insurance and indemnification							
Interest							
Labor relations costs							
Lobbying							
Losses on other awards or contracts							
Maintenance and repair costs							
Materials and supplies costs, including cost of computing devices							
Meetings and Conferences							

Fiscal - Allowable Costs

Statutory Authority: UGG Subpart E-Cost Principles, General Provisions §200.400 Policy Guide, Special Considerations for States, Local Government and Indian Tribes § 200.416, § 200.405, Basic Consideration Allocable Cost, Cost Allocation Plans and § 200.56 Indirect Cost Proposals and Subpart F Audit Requirements § 200.500 Purpose. See the specific section of UGG to each item below:

Directions: Did your Agency spend federal grant funds on any of the selected items below? Check **YES**, **NO or N/A**. If the answer is **YES**, answer the question(s) for the selected item below:

Advertising and public relations costs § 200.421 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Did the agency advertise teaching vacancies? In what media? Were Perkins IV or Adult Ed funds used to purchase the advertisements?
2. What other ads did the agency purchase? In what media?
3. Did the agency use Perkins IV or adult education funds to cover costs of meetings or conventions? Displays, demonstrations, or exhibits? Meeting rooms, hospitality suites, booths or other special facilities?
4. Did Perkins IV or adult education funding provide salaries and wages for employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings?
5. Were federal funds used to cover costs of promotional items and memorabilia, including models, gifts, and souvenirs?
6. Were the agency's advertising and public relations costs designed to promote the agency's programs or the agency itself?

Advisory councils § 200.422 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds used to cover any costs related to advisory councils?

Alcoholic beverages § 200.423 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs of alcoholic beverages?

Alumni(ae) activities § 200.424 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs incurred for or in support of alumni (ae) activities and similar services?

Audit costs and related services § 200.425 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for audit costs and related expenses such as audits required by, and performed in accordance with, the Single Audit Act?

Bad debts § 200.426 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended to cover bad debts, including losses (whether actual or estimated) arising from uncollectible accounts and other claims, related collection costs, and related legal costs?

Bonding costs § 200.427 UGG	☐YES	☐NO	☐N/A
1. Were federal funds expended for bonding costs required by the federal government as assurance against financial loss to itself, including bonds such as bid, performance, payment, advance payment, infringement and fidelity bonds? 2. Are bonding costs required in the general conduct of operations of the agency?			
Commencement and convocation costs § 200.429 UGG	☐YES	☐NO	☐N/A
1. Were federal funds expended for costs incurred for commencement and convocations? a. Were these funds expended for salaries and fringe benefits of members of the academic staff whose responsibilities to the institution require administrative work that benefits commencements and convocations?			
Compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits) § 200.430 UGG	☐YES	☐NO	☐N/A

1. How do you document salaries and wages charged to federal grants?
2. Is the total compensation reasonable for the services rendered? Does it conform to the established policy of the agency consistently applied to both federal and non-federal activities?
3. Who approves payroll?
4. Where employees work solely on a single federal award or cost objective, were charges for their salaries and wages supported by periodic certifications that the employees worked solely on that program for the period covered by the certification?
    a. Were these certifications prepared at least semi-annually and signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee?
    a. Do these PARs reflect an after-the-fact distribution of the actual activity of each employee?
    b. Do they account for the total activity for which each employee is compensated?
    c. Are they prepared at least monthly and coincide with one or more pay periods?
    d. Are they signed by the employee?
    e. Do they reflect budget estimates or other distribution percentages determined before the services are performed? If so, they do not qualify as support for charges to federal awards.
1. If federal funds have been expended for severance pay:
    a. Was severance pay required by law, by employee/employer agreement or by established written policy?
    b. Was severance pay associated with normal turnover and allocated as an indirect cost?			

Contingency provisions § 200.433 UGG	☐YES	☐NO	☐N/A
1. Were federal funds expended as contributions to a contingency reserve or any similar provision made for events the occurrence of which cannot be foretold with certainty as to time, intensity, or with an assurance of their happening? (The term "contingency reserve" excludes self-insurance reserves, pension plan reserves, and post-retirement health and other benefit reserves computed using acceptable actuarial cost methods.)			
Deans of faculty and graduate schools § 200.430 UGG	☐YES	☐NO	☐N/A
1. Were federal funds expended for salaries and expenses of deans of faculty and graduate schools, or the equivalents, and their staff?			

Defense and prosecution of criminal and civil proceedings and claims § 200.435 UGG	☐ YES	☐ NO	☐ N/A
1. If federal funds were expended for defense of criminal and civil proceedings and claims, were they for legal expenses required in the administration of federal programs?			
Depreciation and use allowances § 200.436 UGG	☐ YES	☐ NO	☐ N/A
1. Were federal funds expended as compensation for depreciation and/or use allowances for the use of fixed assets (buildings, capital improvements, and equipment)? 2. Was the computation of depreciation or use allowances based on the acquisition cost of the assets involved? 3. Are the charges for use allowances or depreciation supported by adequate property records and physical inventories that are taken at least once every two years to ensure that the assets exist and are usable, used and needed?			
Donations and contributions § 200.434 UGG	☐YES	☐ NO	☐ N/A
1. Were federal funds expended for contributions or donations (including cash, property, and services) made by the agency? 2. Was the value of donated or volunteer services (furnished to the agency by professional and technical personnel, consultants, or other skilled and unskilled labor) reimbursed as a direct or indirect cost using Federal funds? 3. Was the value of donated services received by the provider used to meet cost-sharing or matching requirements?			
Employee health and welfare costs § 200.437 UGG	☐ YES	☐ NO	☐ N/A

1. Were federal funds expended for the costs of employee information publications, health or first-aid clinics and/or infirmaries, recreational activities, employee counseling services, and any other expenses incurred in accordance with the agency's established practice or custom for the improvement of working conditions, employer-employee relations, employee morale, and employee performance?
    a. Were such costs equitably apportioned to all activities of the agency?
    b. Was income generated from any of these activities offset against expenses?			

Entertainment costs § 200.438 UGG	☐ YES	☐ NO	☐ N/A
1. Were federal funds expended for costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities)?			
Equipment and other capital expenditures § 200.439 UGG	☐ YES	☐ NO	☐ N/A

1. Were federal funds expended for acquisition costs of capital assets (for general purpose equipment, buildings and land) or for expenditures to make improvements to capital assets that materially increase their value or useful life? a. If capital expenditures were direct charges to the grant, were they approved in advance by FLDOE? b. Were equipment and other capital expenditures included in indirect costs? c. When equipment purchased wholly or partly with federal funds is replaced, what is done with the replaced equipment? Is it used as a trade-in? Is it sold and the proceeds used to offset the cost of the replacement property? Is it surpluses? Is it given to another federal program for use in that program? d. When approved as a direct charge, were these capital expenditures charged in the period in which the expenditure was incurred, or as otherwise determined appropriate by and negotiated with FLDOE?			
Fines, penalties, damages and other settlements § 200.441 UGG	☐ **YES**	☐ **NO**	☐ **N/A**
1. Were federal funds expended to cover costs resulting from violations of, or failure of the agency to comply with federal, state, and local or foreign laws and regulations?			
Fund-raising and investment management costs § 200.442 UGG	☐ **YES**	☐ **NO**	☐ **N/A**
1. Were federal funds expended to cover costs of organized fund raising? 2. Were federal funds expended to cover costs of investment counsel and staff and similar expenses incurred solely to enhance income from investments? 3. Were federal funds expended for costs associated with investments covering pension, self- insurance or other funds which include federal participation allowed by UGG §200.403 and §200.442.			
Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of federal programs § 200.443 UGG	☐ **YES**	☐ **NO**	☐ **N/A**
1. Were gains and losses on the sale, retirement or other disposition of depreciable property included in the year in which they occur as credits or charges to the asset cost grouping(s) in which the property was included?			
General costs of government § 200.444 UGG	☐ **YES**	☐ **NO**	☐ **N/A**
1. Were federal funds expended for any of the following general costs of government: a. Salaries and expenses of the Office of the Governor of a state or the chief executive of a political subdivision or the chief executive of a federally recognized Indian tribal government? b. Salaries and other expenses of a state legislature, tribal council, or similar local governmental body, such as a county supervisor, city council, school board, etc., whether incurred for purposes of legislation or executive direction? c. Costs of the judiciary branch of a government? d. Costs of prosecutorial activities unless treated as a direct cost to a specific program if authorized by program statute or regulation (however, this does not preclude the allow ability of other legal activities of the attorney general)? 2. Were federal funds expended for the portion of salaries and expenses directly attributable to managing and operating federal			

programs by the chief executive of a federally recognized Indian Tribal Government or Councils of Governments (COGs) and his or her staff?			
Goods or services for personal use § 200.445 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs of goods or services for personal use of the agency's employees?
2. Were these costs reported as taxable income to the employees?

Housing and personal living expenses § 200.445 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for "costs of housing (such as depreciation, maintenance, utilities, furnishings, rent), housing allowances and personal living expenses for the agency's current or past officers?
2. Were these costs reported as taxable income to the employee?

Idle facilities (completely unused facilities) **and idle capacity** (unused capacity of partially used facilities) **§ 200.446 UGG**	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for "cost of idle facilities" such as maintenance, repair, housing, rent, and other related costs such as insurance, interest, property taxes, and depreciation or use allowances?
   a. Were the costs of idle facilities necessary to meet fluctuations in workload?
   b. Were facilities idle due to changes in program requirements, efforts to achieve more economical operations, reorganization, and termination or due to unforeseen reasons?
2. Were federal funds expended for maintenance, repair, housing, rent and other related costs such as insurance, interest, property taxes and depreciation or use allowances for equipment and/or buildings with idle capacity?
   a. Were the costs of idle capacity normal costs of doing business and a factor in the normal fluctuations of usage from period to period?

Insurance and indemnification § 200.447 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were the costs of insurance required or approved and maintained as required by the federal award?
2. Were federal funds expended for costs of other insurance maintained by the agency in connection with the general conduct of its activities?
   a. Were the types and extent and cost of coverage in accordance with sound business practices?
   b. Were the costs for insurance or of any contributions to any reserve covering the risk of loss of or damage to federally owned property?
3. Were the costs for actual losses which could have been covered by permissible insurance (through self-insurance or otherwise) approved in pursuant to Federal regulations?
4. Were these costs for deductibles or minor losses not covered by insurance, such as the spoilage, breakage and disappearance of small hand tools?

5. Were the contributions to a reserve for certain self-insurance programs including workers compensation, unemployment compensation and severance pay? 6. Were the costs for actual claims paid to or on behalf of employees or former employees for workers compensation, unemployment compensation, severance pay and similar employee benefits? 7. Were the costs for indemnification, securing the agency against liabilities to third persons and other losses not compensated by insurance, and expressly provided for in the federal award? 8. Were the costs for commercial insurance to protect against costs of the contractor for corrections of the contractor's own defects in materials or workmanship?			
Interest § 200.449 UGG	☐ YES	☐ NO	☐ N/A
1. Were federal funds expended for costs incurred for interest on borrowed capital or the use of the agency's own funds? 2. Were federal funds expended for financing costs (including interest) paid or incurred which are associated with otherwise allowable costs of building acquisition, construction, or fabrication, reconstruction or remodeling completed on or after October 1, 1980? 3. Were federal funds expended for financing costs (including interest) paid or incurred on or after September 1, 1995, for land or associated with otherwise allowable costs of equipment?			
Labor relations costs § 200.430 UGG	☐ YES	☐ NO	☐ N/A
1. Were federal funds expended for costs incurred in maintaining satisfactory relations between the agency and its employees, including costs of labor management committees, employees' publications and other related activities?			
Lobbying § 200.450 UGG	☐ YES	☐ NO	☐ N/A
1. Were federal funds expended for the cost of certain influencing activities associated with obtaining grants, contracts, cooperative agreements or loans? 2. Were federal funds expended for executive lobbying costs?			
Losses on other awards or contracts § 200.451 UGG	☐ YES	☐ NO	☐ N/A
1. Were federal funds expended for any excess of costs over income under any other award or contract of any nature? (This includes, but is not limited to, the agency's contributed portion by reason of cost-sharing agreements or any under-recoveries through negotiation or flat amounts for F&A costs.)			
Maintenance and repair costs § 200.452 UGG	☐ YES	☐ NO	☐ N/A
1. Were federal funds expended for costs incurred for necessary maintenance, repair, or upkeep of buildings and equipment (including federal property unless otherwise provided for) which neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in an efficient operating condition? (Costs incurred for improvements, which add to the permanent value of the buildings and equipment or appreciably prolong their intended life, shall be treated as capital expenditures.)			

Materials and supplies costs, including cost of computing devices § 200.453 UGG	☐ YES	☐ NO	☐ N/A

1. Were federal funds expended for costs incurred for materials, supplies and fabricated parts necessary to carry out a federal award?
2. Were purchased materials and supplies charged at their actual prices, net of applicable credits? (Withdrawals from general stores or stockrooms should be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs.)
3. Were materials and supplies actually used for the performance of a federal award charged as direct costs?
4. Was there a charge for federally-donated or furnished materials used in performing the federal award?

Meetings and conferences § 200.432 UGG	☐ YES	☐ NO	☐ N/A

1. Were federal funds expended for the costs of meetings and conferences, the primary purpose of which is the dissemination of technical information? (This includes costs of meals, transportation, rental of facilities, speakers' fees, and other items incidental to meetings or conferences.)

Memberships, subscriptions and professional activity costs § 200.454 UGG	☐ YES	☐ NO	☐ N/A

1. Were federal funds expended for costs of the agency's:
   a. Membership in business, technical, and professional organizations?
   b. Subscriptions to business, professional, and technical periodicals; and/or
   c. Membership(s) in any organization that engages in lobbying activities?

Organization costs § 200.455 UGG	☐ YES	☐ NO	☐ N/A

1. Was approval obtained from the awarding agency prior to the expenditure of federal funds for any of the following? (Incorporation fees, brokers' fees, fees to promoters, organizers or management consultants; attorneys, accountants, or investment counselors, whether or not employees of the organization, in connection with establishment or reorganization of an organization.)

Participant support costs § 200.456 UGG	☐ YES	☐ NO	☐ N/A

1. Was approval obtained from the awarding agency prior to the expenditure of federal funds or stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (not employees), in connection with meeting conferences, symposia or training projects?

Plant and security costs § 200.457 UGG	☐ YES	☐ NO	☐ N/A

1. Were federal funds expended for any of the following activities?
   a. Necessary and reasonable expenses incurred for security to protect facilities, personnel, and work products? (expenses, such as: wages, and uniforms of personnel engaged in security activities, equipment, barriers, contractual security services, consultants)

Pre-award costs § 200.458 UGG	☐ YES	☐ NO	☐ N/A

1. Were federal funds expended for costs incurred prior to the effective date of the award directly pursuant to the negotiation and in anticipation of the award, where such costs are necessary for efficient and timely performance of the scope of work?

Professional service costs § 200.459 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for the costs of professional and consultant services rendered by persons who are members of a particular profession or possess a special skill and who are **not** officers or employees of the agency?

Proposal costs § 200.460 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended on costs of preparing proposals for potential Federal Awards?

Publications and printing costs § 200.461 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for publication costs of printing (including the processes of composition, plate-making, press work, binding, and the end products produced by such processes), distribution, promotion, mailing, general handling and/or page charges for professional publications?
2. Were costs not identifiable with a particular cost objective allocated as indirect costs to all benefiting activities of the agency?
3. If federal funds were expended for page charges for professional journal publications as a necessary part of research costs, did the research papers report work supported by the federal government?
4. Are the charges levied impartially on all research papers published by the journal, whether or not by federally-sponsored authors?

Rearrangement and reconversion costs § 200.462 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs incurred for ordinary and normal rearrangement and alteration of facilities?
2. Was prior approval granted from by the USDOE for special arrangements and alteration costs incurred specifically for the project?
3. Were federal funds expended for costs incurred in the restoration or rehabilitation of the agency's facilities to approximately the same condition existing immediately prior to the commencement of a federal award?
4. Were federal funds expended to cover the cost of wear and tear on the agency's facilities?

Recruiting costs § 200.463 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs incurred pursuant to a well-managed recruitment program to recruit staff in keeping with workload requirements? (These costs include: "help wanted" advertising, operating costs of an employment office necessary to secure and maintain and adequate staff, costs of operating and aptitude and educational testing program, travel costs of employees while engaged in recruiting personnel, travel costs of applicants for interviews for prospective employment and relocation costs incurred incident to recruitment of new employee.)
2. Did the agency use employment agencies that charge standard commercial rates?
3. In publications, did help-wanted advertising include color, additional information other than for recruitment purposes or excessive size?
4. Did recruiting enticements meet the test of reasonableness and conform to the established practices of the agency?
5. Has the agency refunded or credited relocation costs when the costs were incurred incidental to the recruitment of a new employee who resigned for reasons within his control within 12 months of hire?

Relocation costs § 200.464 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were funds used for relocation costs for permanent change of duty or assignment for an indefinite period or for a stated period not less than 12 months, of an existing employee or upon recruitment of a new employee?			
Rental costs of real property and equipment § 200.465 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Are rental costs reviewed periodically to determine reasonableness? (Based on rental costs of comparable property and/ or equipment, market conditions in the area, alternative available, type, life expectancy, condition and value of the property leased.) 2. Are rental costs under "sale and lease back" and "less than arms-length," leases equal to the amounts that would have been allowed had title to the property or equipment been held by the agency?			
Royalties and other costs for the use of patents § 200.448 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Have federal funds been expended on royalties on a patent or copyright or amortization of the cost of acquiring by purchase a copyright, patent, or rights, necessary for the proper performance of the award? 2. Does the federal government have a license or the right to free use of the patent or copyright? 3. Has the patent or copyright been adjudicated to be invalid, or been administratively determined to be invalid? 4. Is the patent or copyright considered to be unenforceable? 5. Has the patent or copyright expired? 6. Did the agency exercise special care in determining reasonableness where the royalties may have been arrived at as the result of a less-than-arm's-length bargaining? (Such as with persons or corporations affiliated with the agency or unaffiliated parties under an agreement entered into in anticipation that a federal award would be made.)			
Scholarships and student aid costs § 200.466 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs of scholarships, fellowships and other programs of student aid to provide training to selected participants and the charge was approved by the sponsoring agency? 2. Were the tuition remission and other forms of compensation paid as, or in lieu of, wages to students performing necessary work or conducting activities necessary to the sponsored agreement? 3. Were these forms of compensation provided in accordance with established institutional policy? 4. Was the tuition or other payments reasonable compensation for the work performed?			
Selling and marketing costs § 200.467 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs of selling and marketing any products or services of the agency?			
Specialized service facilities § 200.468 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs of services provided by highly specialized facilities operated by the agency, such as computing facilities, wind tunnels or reactors?			
Student activity costs § 200.469 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs incurred for intramural activities, student publications, student clubs and other student activities?			

Taxes § 200.470 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for taxes that the organization is required to pay and which are paid or accrued in accordance with General Accepted Accounting Principles (GAAP)?
2. Were federal funds expended for payments, in lieu of taxes, which are commensurate with the local government services received?
3. Were these payments for taxes from which exemptions are available to the institution directly or which are available to the institution based on an exemption afforded the federal government?
4. Were these payments for special assessments on land that represent capital improvements?
5. Were refunds of taxes, interest, or penalties, and any payment to the institution of interest thereon, attributable to taxes, interest or penalties, which were allowed as sponsored agreement costs, credited or paid to the federal government in the manner directed by the federal government?

Termination costs applicable to sponsored agreements § 200.471 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. If an award has been terminated, were there certain costs that could not be discontinued immediately after the effective date of termination?

Training costs § 200.472 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for the cost of training provided for employee development?

Transportation costs § 200.473 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for costs incurred for freight, express, cartage, postage and other transportation services relating either to goods purchased, in process, or delivered?
2. Does the agency follow a consistent, equitable procedure to identify inbound transportation cost in order to be charged to the appropriate F&A cost accounts?
3. Is outbound freight, if reimbursable under the terms of the sponsored agreement, treated as a direct cost?

Travel costs § 200.474 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were all travel expenses (paid from these federal funds) incurred for the official business of the institution?
2. Are all travel charges consistent with the institution's written travel policy?
3. Are all airfare costs coach or equivalent unless they meet the exceptions in UGG §200.474?
4. If institution staff travels by other than commercial carrier, are the travel charges consistent with available commercial charges?

Trustees § 200.475 UGG	☐ **YES**	☐ **NO**	☐ **N/A**

1. Were federal funds expended for travel and subsistence costs of trustees (or directors)? These costs are subject to restrictions regarding lodging, subsistence and air travel costs provided in UGG §200.475.

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