



**Quality Assurance and Compliance
Desk Monitoring Review
for
Career and Technical Student Organizations**

Florida Business Professionals of America

December 4-8, 2017

Final Report

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**Florida Business Professionals of America
Career and Technical Education
Quality Assurance and Compliance Monitoring Report**

I. INTRODUCTION

The Florida Department of Education (FDOE), Division of Career and Adult Education (division), 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 including monitoring. The role of the quality assurance 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 workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

The FDOE receives federal funding from the U.S. Department of Education (USDOE) for Career and Technical Education (CTE) under the Carl D. Perkins (Perkins) Career and Technical Education Act of 2006 and for Adult Education (AE) under the Adult Education and Family Literacy Act of 1998. FDOE awards subgrants to eligible providers to administer local programs. FDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for CTE and adult education/family literacy. 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 pursuant to 34 CFR 76.770, Education Department General Administrative Regulations (EDGAR) and the Uniform Grant Guidance (UGG) for grant awards issued on or after December 26, 2014. The Florida Department of Education, Division of Career and Adult Education is required to oversee the performance of subgrantees in the enforcement of all laws and rules (Sections 1001.03(8) and 1008.32, Florida Statutes).

Additional citations noting pertinent laws and regulations and authority to monitor are located in the 2017-2018 Quality Assurance Policies, Procedures, and Protocols, Module A, Section 1.

III. QUALITY ASSURANCE POLICIES, PROCEDURES, AND PROTOCOLS

The Quality Assurance Policies, Procedures, and Protocols manual was revised for the 2017-18 program year. The manual is provided to each provider prior to the monitoring visit. The manual provides a summary of each facet of the monitoring design and the process. It also contains protocols that may be used as agencies are monitored or reviewed. References may be made to the manual in this document; it is located on the division's website at <http://fldoe.org/academics/career-adult-edu/compliance>.

IV. PROVIDER SELECTION

Various sources of data are used throughout the implementation of the quality assurance system. The monitoring component of the system is risk-based.

Risk assessment is a process used to evaluate variables associated with the grants and assign a rating for the level of risk to the department and the division. A risk matrix, identifying certain operational risk factors is completed for each provider. The risk matrix for each program monitored is located in Appendix A. The results of the risk assessment process and consideration of available resources are used to determine one or more appropriate monitoring strategy(ies) to be implemented.

The monitoring strategy for Florida Business Professionals of America (FBPA) was determined to be a desk monitoring review. Notification was sent to Ms. Allyson Ouellette, president, FBPA on August 23, 2017. The designated representative for the agency was Ms. Sonya Russell, state advisor, FBPA.

The desk monitoring review for the agency was originally scheduled to take place on December 4-8, 2017 by a representative of the Quality Assurance and Compliance section of the division: Mr. Michael Swift, program specialist. Due to lack of correspondence and an unwillingness to adhere to the initial time frame from the designated FBPA contact, the desk monitoring review packet was not returned to the FDOE team leader until a month later on January 5, 2018.

V. FLORIDA BUSINESS PROFESSIONALS OF AMERICA

The provider was awarded the following grants for fiscal years (FY) 2015-16, 2016 -17 and 2017-18

2015-2016

<u>Grant</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended Funds</u>
Perkins – CTSO Leadership	714-1626A-6PL01	\$ 23,846.00	\$ 3,028.15

2016-2017

<u>Grant</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended Funds</u>
Perkins – CTSO Leadership	714-1627A-7PL01	\$ 24,890.00	\$ 607.10

2017-2018

<u>Grant</u>	<u>Grant number</u>	<u>Grant Amount</u>	<u>Unexpended Funds</u>
Perkins – CTSO Leadership	714-1628A-8PL01	\$ 20,951.00	N/A

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

<https://www.flbpa.org>

VI. MONITORING ACTIVITIES

The desk monitoring review activities included administrative, financial, review of deliverables and an exit telephone conference call.

Exit Conference

The telephone exit conference was scheduled for February 20, 2018. The FBPA contact did not take our call at the previously confirmed time, and the telephone exit conference consequently took place the following day on February 21, 2018. The participants are listed below:

Name	Title	Exit
Sonya Russell	State Advisor	X
FDOE		
Tashi Williams	Director, FDOE	X
Michael Swift	Program Specialist IV, FDOE	X

Records Review

Program, financial and administrative records were reviewed. A complete list of records is provided in section VII, item B. Policies and procedures were also reviewed.

VII. RESULTS

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

- Florida Business Professionals of America is a student organization that consists of local chapters that all act in accordance with a charter granted by the national organization. FBPA has an executive council as well as a Board of Directors, with each having specific duties listed within the FBPA constitution.
- The state organization consists of local chapter members, state officers, regional officers, local chapter advisors, an executive council and a Board of Directors.
- The state advisor, which serves as a member of the Board of Directors, operates under a contracted consultant agreement for a term of one fiscal year. During the FY17/18 Sonya Russell was appointed as the state advisor by the FBPA Board of Directors. Ms. Russell served as the liaison between FDOE and the FBPA Board of Directors, and was responsible for the timely submission of quarterly deliverables to the grants office.
- FBPA follows the code of regulations for policies and procedures of the national organization. The state organization also has a local constitution that is followed in conjunction with the policies and procedures of the national organization. All documents were reviewed by the FDOE monitoring staff.
- The desk monitoring review packet was submitted back to FDOE in an unsatisfactory time frame, as multiple unsuccessful attempts were made to contact our provider to begin the review. This along with other lapses of time in which FDOE had difficulties contacting the provider during the review period caused the review to take longer than initially expected.
- The provider predicted that a number of deliverables were to be submitted during quarters in which they were impossible to complete. The grant manager allowed FBPA the opportunity to revise their schedule of deliverables to better fit the activities of the provider’s calendar.
- FBPA has shown a consistent inability to adhere to submission guidelines for quarterly deliverables and invoices as required by the 2015-2016 CTSO request for application (RFA).

FINDING AND CORRECTIVE ACTION

Finding A1: The provider failed to submit multiple quarterly invoices and deliverables in accordance with the requirements set forth in the Invoicing Procedures listed in the Perkins 2015-2016 CTSO RFA.

- The FDOE grant manager responsible for FBPA informed the monitoring staff that the provider has routinely had issues with submitting deliverables and other requested documentation in a timely manner.
- FBPA routinely submitted deliverables after the designated deadlines as set forth in the 2015-2016 CTSO Request for Application (RFA).
 - Quarter #1: invoiced received on 11/18/2015 vs the deadline of 10/20/2015

- Quarter #2: invoiced received on 6/2/2016 vs the deadline of 1/20/2016
- Quarter #3: invoiced received on 6/26/2016 vs the deadline of 4/20/2016
- Quarter #4: invoiced received on 9/15/2016 vs the deadline of 8/20/2016
- FDOE monitoring staff has also been made aware that **NO** deliverables for FY17/18 had been submitted as of February 21, 2018.

Corrective Action A1: The provider must abide by the invoice submission deadlines as stated in the CTSO RFA. Failure to do so will result in delays in payment and/or non-payment for completed deliverables.

B. RECORDS REVIEW refers to a review of the records and documents that demonstrate compliance with federal and state rules and regulations. Samples of financial and programmatic records are reviewed.

- FY 2015/16, 2016/17 and 2017/18 quarterly deliverables submitted to FDOE
- National BPA financial and accounting policies and procedures
- Local FBPA constitution
- Boards of Directors meeting minutes, sign-in sheet and agenda
- Salary invoices in-lieu of time and effort reports for those paid out of the grant
- Signed consultant agreement between FBPA and Sonya Russell for services as the FY17/18 state advisor
- Signed consultant agreement between FBPA and Sheena Wiley for services as the FY17/18 state treasurer
- Board of Director approved operating budget for FY15/16
- FBPA code of regulations policies and procedures
- Signed contractual agreements for services rendered during a state convention
 - additional quotes from two other potential vendors
- Bank statements and checks showing items paid by the state advisor
- The completed Desk Monitoring Review packet

C. FINANCIAL refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management, and allowable costs.

- FBPA has national and state policies and procedures pertaining to the fiscal management of the organization, and the monitoring team determined that those guidelines are being followed.
- The Perkins grant for FBPA pays the salary of the state advisor, the state treasurer and provides funding to support vendor contracts for their annual state convention.
- FBPA had previously been warned about not adhering to their guidelines requiring at least three vendor quotes for any purchase over the amount of \$10,000.
 - The previous grant manager informed the former state advisor that FBPA was not receiving the necessary three quotes in regards to a large purchase for their annual state convention. After further records review it was determined that FBPA immediately began requesting the necessary three quotes prior to selecting a vendor for their future state conventions.
- The state organization has approved and revised bylaws that allow the president of the Board of Directors to sign checks in accompaniment to the state treasurer's signature.
- The following deliverables were submitted in the required invoice quarter with insufficient evidence or documentation of completed tasks, and were not paid during the invoice quarter in which they were submitted.
 - Deliverable 5.2 had insufficient evidence to show that state officer training did take place.

- Deliverable 5.3 contained no documentation showing coordination/planning for state officer workshops and training.
- Deliverable 5.1 had insufficient evidence to support the elections and results of state officers.
- Deliverable 7.1 was submitted with no accompanying documentation and/or evidence to support completion of the task.
- Deliverable 7.2 contained no documentation that supported the planning and carrying out of district, regional and state competitive events.
- Deliverable 7.3 had insufficient evidence supporting the creation of district and state competitive events.
- Deliverable 7.4a contained no documentation that information regarding upcoming district and state competitive events were disseminated to all participating local chapters.
- Deliverable 9.1(a)(b) had insufficient evidence that supporting the states planned participation in national FBPA events.
- Deliverable 9.2 contained no documentation showing the state participation in national FBPA events.
- The following deliverables were approved by the FDOE grant manager for resubmission and paid during subsequent invoice quarters.
 - Deliverables 5.1, 5.3 and 6.1 were paid with the second quarter invoice as opposed to quarter one.
 - Deliverables 7.1, 9.1a, 9.1b, and 9.2 were paid with the third quarter invoice as opposed to quarter two.

VIII. REQUIRED RESOLUTION ACTIVITIES

CAREER AND TECHNICAL EDUCATION

1. Corrective Action Plan (findings) –FBPA is required to complete a CTSO corrective action plan.

IX. SUMMARY

Once the desk monitoring review is completed, including receipt of requested information, a preliminary report will be forwarded to the provider for review. Comments are accepted and considered. Once received back in our office, the report will be finalized and forwarded to the President of the Board of Directors with a copy to all appropriate parties. The final report will also be posted on the department's website at the following address: <http://fldoe.org/academics/career-adult-du/compliance>.

The division will issue a closure notice to the President of the Board of Directors and contact designee once all outstanding resolution items have been completed.

On behalf of the department, the monitor, Mr. Michael Swift, extends his appreciation to all participants in the Florida Business Professionals of America desk monitoring review. Special thanks is offered to Ms. Sonya Russell for her participation in this process.

APPENDIX A
 Florida Business Professionals of America
 Career and Technical Education
 Risk Matrix

**Risk Scores Matrix for Non-Colleges Receiving Career and Technical Education (CTE)
 Carl D. Perkins Grants**

Agency Name: **FLA FBLA-PBL ASSC. INC**
 Program type: **CTE**
 Target Year: **2015-2016**
 Monitoring Year: **2017-2018**

Metric	Scaling	Point Value	Points Assigned	Weight	Total Metric Points
*Last Monitored	7 or More	7	7	<u>X 10</u>	70
	5-6	5			
	3-4	3			
	0-2	1			
Total Perkins Budget Allocated Value	Upper Quartile	7	5	<u>X 8</u>	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
# Perkins Grants Value	4 or More	7	1	<u>X 8</u>	8
	3	5			
	2	3			
	1	1			
Perkins Director Change Value	Yes	7	0	<u>X 6</u>	0
	No	0			
Perkins Funds Remaining Point Value	Upper Quartile	7	0	<u>X 4</u>	0
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
AGENCY RISK SCORE:					118

APPENDIX B

Florida Business Professionals of America Resolution Action Plan

Findings	Corrective Actions	Agency Response	Person Responsible	Projected Date of Completion
<p>Finding A1: The provider failed to submit multiple quarterly invoices and deliverables in accordance with the requirements set for in the Invoicing Procedures listed in the Perkins 2015-2016 CTSO RFA.</p> <ul style="list-style-type: none"> • The FDOE grant manager responsible for FBPA informed the monitoring staff that the provider has routinely had issues with submitting deliverables and other requested documentation in a timely manner. • FBPA routinely submitted deliverables after the designated deadlines as set forth in the 2015-2016 CTSO Request for Application (RFA). • Quarter #1: invoiced received on 11/18/2015 vs the deadline of 10/20/2015 • Quarter #2: invoiced received on 6/2/2016 vs the deadline of 1/20/2016 • Quarter #3: invoiced received on 6/26/2016 vs the deadline of 4/20/2016 • Quarter #4: invoiced received on 9/15/2016 vs the deadline of 8/20/2016 • FDOE monitoring staff has also been made aware that NO deliverables have been submitted for the current FY17/18. 	<p>Corrective Action A1: The provider must abide by the invoice submission deadlines as stated in the CTSO RFA. Failure to do so will result in a delays in payment and/or non-payment for completed deliverables.</p>			
<p>Plan submitted by (name and title):</p>		<p>Date:</p>		
<p>Plan accepted by:</p>		<p>Date:</p>		
<p>Status of Action Plan (to be completed by FDOE staff):</p>				
<p>Date:</p>		<p>Status of Plan Completion:</p>		