



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

# **CORE MONITORING GUIDE**

---

**Quality Assurance and Compliance**

# Table of Contents

<b>INTRODUCTION</b> .....	<b>4</b>
BACKGROUND .....	4
INTENT OF THIS GUIDE .....	4
STRUCTURE AND USE .....	6
CORE ACTIVITIES .....	7
<b>MONITORING REVIEW</b> .....	<b>11</b>
PURPOSE .....	11
THREE COMPONENTS OF AN ON-SITE/DESK REVIEW .....	11
ROLES OF THE REVIEWER .....	12
GRANT (WORKING) FILE .....	14
<b>PRE-MONITORING REVIEW AND PREPARATION</b> .....	<b>15</b>
MANAGING GRANT RECIPIENT’S EXPECTATIONS .....	15
ON-SITE/DESK MONITORING PLAN .....	15
PRE-VISIT ON-SITE MONITORING SCHEDULE .....	19
ON-SITE TRAVEL AND LOGISTICS .....	20
<b>ON-SITE/DESK MONITORING</b> .....	<b>21</b>
MANAGING THE GRANT RECIPIENT’S EXPECTATIONS .....	21
ENTRANCE CONFERENCE .....	21
ON-SITE/DESK COMMUNICATIONS .....	21
TECHNICAL ASSISTANCE .....	22
FOUR Cs .....	22
EXIT CONFERENCE .....	24
<b>POST-ON-SITE VISIT/DESK REVIEW</b> .....	<b>26</b>
MANAGING THE GRANT RECIPIENT’S EXPECTATIONS .....	26
KEY ELEMENTS OF A MONITORING REPORT .....	26
EVIDENCE-BASED MONITORING REPORT .....	28
RESOLUTION PROCESS .....	29
CONCLUSION .....	29
<b>CORE ACTIVITIES – INTRODUCTION TO THE CORE ACTIVITIES</b> .....	<b>30</b>
<b>CORE ACTIVITY 1 CAREER AND TECHNICAL EDUCATION</b> .....	<b>32</b>
INTRODUCTION .....	33
OBJECTIVE 1.A: ACCOUNTABILITY .....	34
OBJECTIVE 1.B: LOCAL APPLICATION .....	36
OBJECTIVE 1.C: LOCAL USE OF FUNDS .....	44
OBJECTIVE 1.D: LEADERSHIP ACTIVITIES .....	51
OBJECTIVE 1.E: STUDENT ORGANIZATIONS .....	58
<b>CORE ACTIVITY 2 ADULT EDUCATION</b> .....	<b>62</b>
INTRODUCTION .....	65
OBJECTIVE 2.A: PERFORMANCE ACCOUNTABILITY SYSTEM .....	65
OBJECTIVE 2.B: LOCAL APPLICATION .....	71
OBJECTIVE 2.C: LEADERSHIP ACTIVITIES .....	73
OBJECTIVE 2.D: INTEGRATED ENGLISH LITERACY AND CIVIC EDUCATION .....	78
OBJECTIVE 2.E: INTEGRATED EDUCATION AND TRAINING (IET) .....	83

<b>CORE ACTIVITY 3 FINANCIAL MANAGEMENT .....</b>	<b>84</b>
INTRODUCTION .....	84
OBJECTIVE 3.A: STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT .....	86
OBJECTIVE 3.B: CONTRACTS AND PROCUREMENT.....	88
OBJECTIVE 3.C: EQUIPMENT .....	90
OBJECTIVE 3.D: ALLOWABLE COST .....	93
OBJECTIVE 3.E: COVID-19 .....	104
<b>CORE ACTIVITY 4 DATA ACCOUNTABILITY &amp; REPORTING.....</b>	<b>107</b>
INTRODUCTION.....	108
OBJECTIVE 4.A: AE & CTE ACCOUNTABILITY.....	109
<b>CORE ACTIVITY 5 CARES ACT.....</b>	<b>112</b>
INTRODUCTION.....	113
OBJECTIVE 5.A: BUILDING K12 INFRASTRUCTURE .....	114
OBJECTIVE 5.B: RAPID CREDENTIALING .....	118
<b>APPENDIX.....</b>	<b>123</b>
RESOURCE A: STUDENT DATA VERIFICATION.....	124
RESOURCE B: CROSS-REFERENCE OF GRANT MANAGEMENT REQUIREMENTS.....	125
RESOURCE C: ANALYSIS FOR MONITORING.....	126
RESOURCE D: USING EFFECTIVE INTERVIEWING TECHNIQUES.....	127
RESOURCE E: SAMPLING METHODOLOGY .....	129
RESOURCE F: MONITORING FINDING TEMPLATE .....	130
RESOURCE G: PROCUREMENT STANDARDS .....	131
TOOL A: GRANT BUDGET ANALYSIS TOOL .....	132
TOOL B: SUMMARY OF RESULTS / REVIEWER NOTES.....	133
TOOL C: COMPLIANCE DETERMINATION TOOL .....	134
TOOL D: EQUIPMENT - INVENTORY .....	135
TOOL E: EQUIPMENT - DISPOSITION FORM.....	136
TOOL F: EQUIPMENT - COVID 19 .....	137

# INTRODUCTION

## BACKGROUND

The Florida Department of Education (FDOE), Division of Career and Adult Education (DCAE), Quality Assurance and Compliance (QAC) are carrying out its roles of leadership, resource allocation, technical assistance, monitoring, and evaluation that is required to oversee the performance and regulatory compliance of recipients of federal and state funding. The QAC section is responsible for designing, developing, implementing, and evaluating a comprehensive quality assurance system and compliance system, including monitoring. The role of the QAC system is to assure financial accountability, program quality, and regulatory compliance.

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 risk level to the FDOE. In order to complete a risk assessment, certain risk factors have been identified, which may affect the level of risk for each provider. In addition, an annual 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 and Uniform Grant Guidance (UGG). The timely identification of non-compliance provides the framework to make changes expected to result in programs becoming more efficient and effective. Addressing the provider's program performance is essential to the division's accountability system. A comprehensive and multi-dimensional QAC system is a foundation for the continuous improvement of services and procedures internally and externally. Our commitment to excellence supports accountability, collaboration, targeted technical assistance, continuous improvement, and positive systemic change.

## INTENT OF THIS GUIDE

The Core Monitoring Guide (CMG) is a tool for the reviewer to perform an on-site/desk review of a grant recipient's core activities. The purpose of the review is to evaluate the management, administration and financial aspects of the grant, the quality of the program, services, and the performance of the grant to determine if the program is operating in compliance with the grant agreement and in a manner that ensures achievement of its goals and outcomes. In addition, the CMG provides a consistent framework to allow the reviewer to assess the grant recipient's compliance in meeting the requirements outlined in its grant agreement, and federal and state regulations. While general use of the CMG is expected, not all Core Activities, objectives, or indicators may be applicable to the provider under review, or time may not allow for total usage of the CMG.

## **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 WIOA became effective on July 1, 2015. The 2015-2016 year served as a transition year for agencies receiving state and federal grant dollars. WIOA was executed during the 2016-2017 monitoring year. The State Unified Plans and Common Performance Accountability provisions took effect on July 1, 2016.

The Perkins program is the primary federal investment in career and technical education at secondary and postsecondary levels. The latest iteration of Perkins, known as Perkins V, was signed into law in 2018 as the Strengthening Career and Technical Education for the 21st Century Act (SCATE). The Act, which took effect July 1, 2019, amends the Carl D. Perkins Career and Technical Education (Perkins IV) Act of 2006 and reauthorizes Perkins for six years. The 2019-2020 year served as a transition year for agencies receiving Perkins V federal grant dollars. The Act's purpose is "to develop more fully the academic knowledge and technical and employability skills of secondary education students and postsecondary education students who elect to enroll in CTE programs and programs of study."

FDOE awards sub-grants to eligible providers to administer local programs. FDOE 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, 2 CFR §§ 200.329 (monitoring and reporting program performance) and 200.501 (audit requirements) and § 215.86, Florida Statutes (F. S.).

The QAC section relies on its staff's professional judgment and experience to carry out its oversight functions successfully. For example, the staff is expected to coordinate and complete compliance and performance monitoring in accordance with the system requirements. In addition, the 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.

QAC staff is expected to demonstrate, model, and reinforce 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 contributions to work assignments and projects, and when representing FDOE.

The CMG is intended to be used broadly by any reviewer conducting an on-site or desk monitoring of any program currently administered by the DCAE. Where appropriate, the CMG calls attention to certain unique features of a particular program; however, guidance specific to different federal grant programs may be addressed in other supplements to the CMG.

### Instructions

- ◆ Introduction to Monitoring Reviews
- ◆ Pre-Monitoring Review and Preparation
- ◆ On-Site Monitoring Review
- ◆ Desk Monitoring Review
- ◆ Post-Visit Activities

### Core Activities

- ◆ Career and Technical Education
- ◆ Adult Education
- ◆ Financial Management
- ◆ Data Accountability & Reporting
- ◆ CARES Act

### Appendix

- ◆ Resources
- ◆ Tools

## STRUCTURE AND USE

This guide offers:

- ◆ **Instructions for On-Site and Desk Monitoring:** Guidance for conducting pre-monitoring reviews, on-site reviews, desk reviews and post-visit activities, including the issuance of a monitoring report.
- ◆ **Core Activities:** Outlines the review of the five core functions: Core Activity 1 Career and Technical Education, Core Activity 2 Adult Education, Core Activity 3 Financial Management, Core Activity 4 Data Accountability & Reporting, Core Activity 5 CARES Act, and includes indicators to assess grant requirement expectations.
- ◆ **Appendix:** Tools and resources that help the reviewer conduct an on-site or desk review.

## INSTRUCTIONS

This section of the guide starts with the **Introduction to Monitoring Reviews** to provide the reviewer with information on the importance of monitoring reviews, the purpose of oversight, and how the reviewer can prepare for on-site and desk monitoring. The instructions included in the CMG provide in-depth information to reviewers with varying levels of experience. Both new and experienced reviewers may find the information valuable, as the CMG offers tools for analysis.

The instructions include:

**Pre-Monitoring Review and Preparation** helps the reviewer determine the objectives they will focus on during the on-site or desk review. It enables the reviewer to pre-assess performance, develop a review scope, and identify Points of Contact (POC).

**On-site Monitoring** focuses on the on-site portion of the review.

**Desk Monitoring** focuses on the desk monitoring portion of the review.

**Post-Visit Activities** provide the reviewer with guidance on follow-up with grant recipients, preparation of the monitoring report, and resolution of monitoring findings.

## CORE ACTIVITIES

**Core Activity 1.** addresses how the grant recipient designed and delivered the services to support Career and Technical Education's strategy.

**Core Activity 2.** addresses how the grant recipient designed and delivered the services to support Adult Education's strategy.

**Core Activity 3. Financial Management** addresses how the grant recipient manages the financial systems of the grant, including inventory management. These are part of the overall organizational, and administrative systems that support grant functions or activities necessary for the operation of a project but are not related to the direct provision of services.

**Core Activity 4. Data Accountability and Reporting** addresses how the grant recipient manages the required student data and reports required to be submitted to the Department.

**Core Activity 5. CARES Act** addresses how the grant recipient utilized

## OBJECTIVES AND INDICATORS

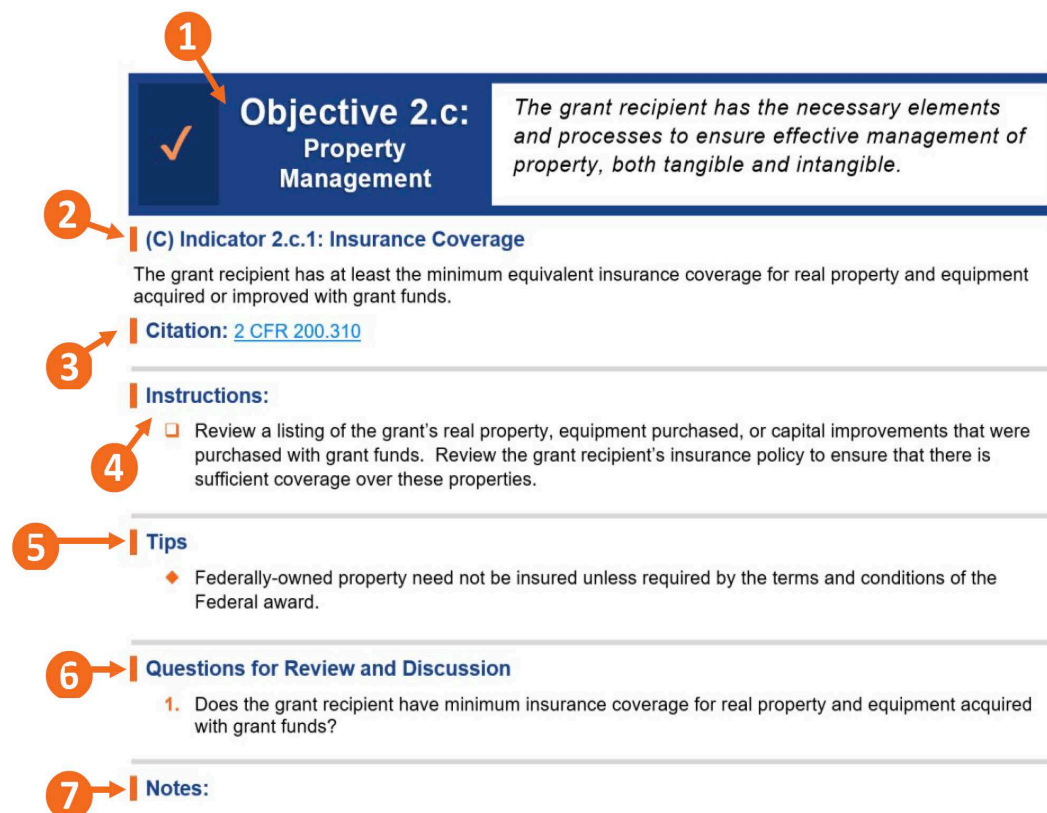
Each Core Activity is organized around specific subject areas called objectives. These objectives address a particular requirement or topic in statutes, regulations, the Request for Application (RFA), Grant Terms and Conditions, and the UGG. Indicators accompany each objective. The indicators and the corresponding questions are the criteria that are used to determine that the objective or requirement is being met.

The indicators are labeled (C) for compliance that must be met or (E) for effectiveness that may result in an area of concern or a finding at a later time if not addressed. If a compliance indicator is not met, it results in a finding.

A finding is a violation (condition) of a specific compliance requirement in the law, regulations, national policies, RFA, UGG, the Grant Terms and Conditions, federal policy guidance, and the grant agreement that requires specific corrective action. Each finding should contain a topic sentence that describes the condition (the compliance violation), the cause of the violation, the citation supporting the condition as a compliance issue, and the requirements for appropriate corrective action by the grant recipient, including timeframes for completion. This is known as the four Cs: Condition, Cause, Criteria, and Corrective Action, discussed later in the section.

Areas of concern or observations: If an effectiveness indicator is not met and the reviewer believes that it may result in a finding at some later point if not addressed, an area of concern or observation is identified. Areas of concern or observations are not specific compliance violations but may negatively impact the program or lead to a future finding. Traditionally, no corrective action is specified or required for areas of concern or observations but may instead include suggestions for improvement.

## CORE ACTIVITY STRUCTURE



- Each Core Activity is organized around general requirements derived from federal, state, and local regulations or promising practices related to that Core Activity. These requirements or expectations are called objectives.



2. Each objective includes a set of indicators or those attributes or criteria that attest that the objective or requirement is being met. The Indicators are marked with a (C) for Compliance indicators that must be met or an (E) for Effectiveness indicators.
3. Each (C) indicator includes a citation for reference.
4. Each Indicator includes instructions that you might use to begin assessing whether the indicator is present. In addition, you may expand upon their use or employ other means of evaluating the grant recipient's performance.
5. Some indicators include tips to help your review.
6. Each indicator includes Questions for Review and Discussion that will help assess the subject area's compliance or effectiveness.
7. Record your notes and specific findings at the indicator level so that you have a means for recreating the basis for your determination if a question arises later.

## **APPENDIX**

The Appendix to the CMG contains the reviewer's tools and resources to perform an in-depth assessment of the CMG indicators. Also, it includes a list of definitions found in the guide. The Appendix is for general use on a variety of grant programs.

## **USING THE GUIDE**

The CMG is designed to be used for the pre-visit, on-site or desk review, and post-visit.



**Prior to a review, use the guide to plan and make preparations for the monitoring review.**

This initial review helps the reviewer determine which Core Activities (1, 2, 3, 4, or 5) and objectives should be reviewed, the locations to visit, and brainstorm areas that will need more in-depth analysis. Pre-Monitoring Review prepares the reviewer to dig deeper during their review to determine causes and appropriate corrective actions.



**While reviewing, use the guide as a probing tool to acquire the context.**

Context to compliance deficiencies is provided through multiple conversations, observations, and document reviews. Probing deeper in specific areas, such as financial and administrative policies, procedures and accounting, internal controls, and purchasing systems, and conducting sampling of transactions and documentation may expand the reviewer's scope or draw the reviewer deeper into identifying the root cause of identified issues. Based on the reviewer's examination of the indicator (s), use the guide to determine if the grant recipient achieved the Core activity's objectives.



**During the post-monitoring, use the guide to translate the data into a monitoring report.**

The monitoring report communicates the results of the review, including findings and areas of concern. The report also provides the grant recipient with corrective actions that address the causes of the findings.

# MONITORING REVIEW

## PURPOSE

The monitoring review is an oversight activity that may lead to opportunities for technical assistance and corrective action. For the grant recipient’s purposes, a monitoring review is a process used to measure progress, identify areas of compliance, offer technical assistance opportunities to help resolve non-compliance issues, and ensure that Federal funds are used responsibly.

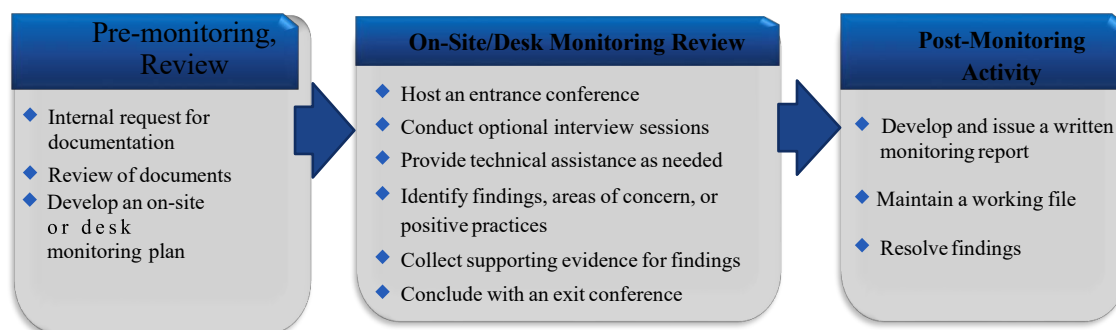
- ◆ Identify areas of compliance
  - The reviewer assesses the grant recipient’s compliance with applicable laws, regulations, rules and other requirements using the Core Activities indicators during the on-site or desk monitoring process.
  - Steps to ensure timely and adequate corrective action are also tracked.
  
- ◆ Provide technical assistance
  - The reviewer identifies technical assistance and training needs and promptly addresses them. Technical assistance can occur at any time during the grant life cycle and can take many forms.

Whether the grant recipient is new to federally-funded programs or is a long-time recipient of federal grant funds, the reviewer needs to take several steps to prepare and plan for on-site or desk reviews. There are instances where grant recipients fail to realize that their standard practices are not always in compliance with laws and regulations. These are blind spots that can become visible with adequate monitoring.

Being proactive with monitoring goes beyond only looking at compliance issues; it extends to identifying ways to improve the grant recipient’s effectiveness and efficiency.

## THREE COMPONENTS OF AN ON-SITE/DESK REVIEW

On-site/desk monitoring reviews typically include the following three components:



## ROLES OF THE REVIEWER

A good reviewer wears several hats. In addition to monitoring for compliance, reviewers are relationship builders, subject matter experts (SMEs), and drivers of continuous improvement. The reviewer builds a relationship with the grant recipient by maintaining open communication, managing expectations, and acting professionally, respectfully, and responsively.

To accomplish this, the reviewer should:

- ◆ Follow protocol consistently;
- ◆ Be punctual, prepared, and courteous;
- ◆ Acknowledge the complex challenges faced by staff in implementing programs and managing funds;
- ◆ Encourage improvements and the replication of best practices that lead to efficiencies;
- ◆ Acknowledge that management and staff have expertise, knowledge, skills, and competencies;
- ◆ Meet deadlines and return emails/phone calls promptly; and
- ◆ Connect the grant recipient with other successful peers in areas in which the grant recipient is struggling.

Reviewers are expected to be subject matter experts. Therefore, they should:

- ◆ Be well-versed in Federal and State requirements and policies relating to the grant or initiative;
- ◆ Have a thorough knowledge of State or local plans of the grant;
- ◆ Be knowledgeable of practices regarding governance, project management, performance management, and workforce development programs;
- ◆ Be educated about the grant recipient by reviewing the grant file to gain familiarity with the status of the project; and
- ◆ Know where to research or whom to reach out to if unsure about a question posed by the grant recipient.

The reviewer must come prepared with the information collected and examined from the pre-monitoring review and preparation (See Pre-Monitoring Review and Preparation section).

## GRANT RECIPIENT/PROVIDER SELECTION

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

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 QAC 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 FDOE 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 providers with high risk scores will be monitored with consideration of the resources available. Unique circumstances may contribute to the addition or postponement of on-site or desk monitoring reviews for some agencies.

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

Any monitoring strategy may be utilized up to and including on-site 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 providers monitored on-site 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 providers whose size may dictate monitoring by regions or geographic areas during successive years, and such arrangements will be made with the individual provider.

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

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 on-site or desk monitoring review, such support contracts may be included in scheduled activities. Should additional Core Activities and Objectives be developed specifically for these agencies, such objectives would be distributed before any monitoring activities. Alternative schedules may also be implemented. Such contracts include but are not limited to leadership grants, associations, and CTSOs.

## GRANT (WORKING) FILE

A grant file or working file consists of several types of information that, taken together, contain all the necessary documentation a reviewer needs to monitor effectively. In addition, the information contained in the working file supports assessments of whether the grant recipient is fulfilling the specified requirements outlined in the RFA and grant.

All important grant documents must be uploaded into the QAC shared drive.

A grant (working) file:

- ◆ Provides documentation that is critical in making important decisions about the grant;
- ◆ Provides information to the reviewer on how to advise the provider when seeking technical assistance;
- ◆ Furnishes a copy of all grants being reviewed;
- ◆ Includes all Core Activities, objectives, notes, documentation, and essential correspondence;
- ◆ Includes evidence of findings;
- ◆ Includes reports and corrective action documentation;
- ◆ Allows for a smooth transition if/when there is a change in staff.

A typical grant (working) file may contain the following sections and contents:

File Sections	Contents
<b>Grants and Amendments</b>	All grants being reviewed All amendments for those grants Florida Grants System (FLAGS)
<b>Monitoring Activities</b>	Core Activities and Objectives Notes Reports Corrective action plan – Evidence of findings, approval of corrective action plan, evidence of corrective actions Project Disbursement Reports – FDOE399, FDOE499 Auditor-General Audit Reports National Reporting System (NRS) AE Annual Report Data Program Improvement Plan (PIP) Perkins Performance Measures Program Improvement Plan
<b>Correspondence</b>	Notification memos Emails Copies of letters Closure letter Thank you letter

# PRE-MONITORING REVIEW AND PREPARATION

## MANAGING GRANT RECIPIENT'S EXPECTATIONS

During the Pre-Monitoring Review and Preparation stage, managing the grant recipient's expectations is accomplished through ongoing communication. In addition, communication lays the groundwork for establishing positive relationships that ensure productive monitoring functions.

Prior to the review, discuss expectations with grant recipient staff by phone and email and through a formal written notice. Information provided through these discussions includes the objectives of the review, review dates, times, reviewer names, what will be covered during the review, the tools to be used to conduct the review, the documentation to be reviewed during the review, and an agenda including topics that will be covered and staff who need to be available for interviews.

## AUTHORITIES AND REQUIREMENTS

Before conducting a monitoring review, the reviewer needs to ensure that they are familiar with the applicable law, regulations, and departmental guidance. These include:

- ◆ The authorizing Federal and State regulations that govern the recipient's program
- ◆ The grant agreement and any amendments
- ◆ The State Plan
- ◆ FDOE The Project Application and Amendment Procedures for Federal and State Programs (Green Book)
- ◆ FDOE Financial and Program Cost Accounting and Reporting for Florida Schools (Red Book)
- ◆ FDOE Florida College Accounting Manual (FCAM)
- ◆ Office of Management and Budget (OMB) 2 CFR Chapter II, Part 200, et al., Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

## ON-SITE/DESK MONITORING PLAN

Upon completing the risk matrix, the QAC director will assign a team of Program Specialists to each provider selected for on-site or desk monitoring. There will be one team leader per provider, and this individual will serve as their primary FDOE contact for the entire monitoring process. For on-site monitoring visits, the remaining team members will be assigned the role of "participant." They will assist the team leader in carrying out all aspects of the on-site monitoring process. Desk monitoring reviews will not require additional "participants" to complete the process, but you may be asked to assist the team leader if help is needed.

While monitoring plans for on-site and desk reviews vary by grant and grant type, listed below are general practices that apply to all grants.

1. **Complete a Conflict of Interest Form** Each QAC team member will complete a Conflict of Interest form for each provider to serve as a team leader or as a participant. All team members will upload the completed forms into the assigned Grant (working) Folder on the QAC sharefile before the monitoring review.
2. **Provider Notification** - the QAC administrative assistant will mail, via USPS, a notification letter to the provider's leadership. The letter will be addressed to a college president, a superintendent of a school district, or the executive director of a community-based organization or career and technical student organization.
  - ◆ The QAC administrative assistant will then prepare a separate notification memo, via email, to the designated provider contacts. This memo will contain information on items to start gathering in preparation for our review and directions on registering for the upcoming provider training webinar.
  - ◆ Each provider should then register for the provider training webinar utilizing the information located in the memo. The QAC administrative assistant will keep track of which providers have registered for the webinar.
  - ◆ The notification memo will include a list of records to submit to the FDOE team leader for on-site visits. The provider should submit all of the requested documentation by the deadline noted in the notification memo.
3. **Provider Webinar** - The purpose of the webinar is to deliver a detailed overview of the QAC monitoring process that will take place at the time of the on-site visit or desk monitoring review. The webinar will also outline details on best practices, common findings, and information on the provider's expectations during this entire process. Details for the webinar are contained within the notification memo that is emailed to the provider contact. It includes a webinar registration link and directions on accessing the PowerPoint presentation that will be used.
4. **FDOE Citrix ShareFile** - Citrix ShareFile® is the FDOE cloud-based secure file transfer solution. This solution is used to transfer confidential files too large and too numerous to send in a single email. Each provider will be required to utilize the secure folder to transmit requested documents for the compliance monitoring review.
5. **Grant (working) File** - Create a Grant (working) File in the QAC section of the shared drives with each of the required sections: Correspondence, Grants, Interview, records, documents, reports, and Travel. All the necessary documents needed to be kept for compliance monitoring review will be stored in this folder for audit purposes. The retention for these documents is five years, per the FDOE Green Book.
6. **Determine Core Activities and Objectives** - Select the Core Activities and Objectives during the monitoring review.



7. **Preparation for monitoring review** - The team lead begins to prepare for on-site or desk monitoring review. In preparation for an on-site visit, the team leader will complete the following tasks: coordinate with the administrative assistant for travel plans and create an on-site monitoring schedule shared with the provider contact to ensure that essential logistics will be met while the monitoring team is on-site. As a participant in a monitoring visit, you may be asked to assist the team leader with any aspect of preparation for a monitoring visit.
8. **Post-monitoring review** – The team lead begins the post activities for the on-site or desk monitoring review. The team leader will collect records, forms, objectives, and notes to start the preliminary report.

## **GRANT REVIEW**

Reviewers should become familiar with how the grant recipient performed on their particular project by reading all the monitoring grants. Typically, they will pull three years of grants to review. CTE grants and AE grants share some similar elements but also have some unique elements. Ensure that you are familiar with the grant type and individual aspects of your grant.

## **COMPONENTS OF GRANT REVIEW**

Examples of components in a grant review may include, but are not limited to, the following:

- ◆ Comprehensive Local Needs Assessment (CLNA)
- ◆ Program of Study
- ◆ Career Exploration and Guidance
- ◆ Continuous Academic Improvement and Academic Integration
- ◆ Description of Equity and Access for Special Populations
- ◆ Opportunities for Work-Based Learning
- ◆ Opportunities for Postsecondary Credit for Secondary Students
- ◆ Support for CTE Personnel
- ◆ Performance of Special Populations and Subgroups
- ◆ Accountability and Program Improvement
- ◆ Support for Reading/Strategic Imperatives
- ◆ Description of Automotive Service Technology Education Programs
- ◆ Description of Federal Programs – General Education Provisions Act (GEPA)
- ◆ Budget Narrative
- ◆ Contracts and Sub Awards
- ◆ Partner Programs and Organizations
- ◆ AE and CTE site locations, including correctional facilities
- ◆ Deliverables
- ◆ Data

## GRANT REVIEW PROCESS

### *Budget Narrative*

The reviewer examines the budget narrative to understand how the grant recipient plans to spend the allocated money to accomplish its goal.

- Review the budget narrative
- Take notes to follow up with the provider during the review.
- Pay special attention to equipment purchased

### *Grant Budget Analysis*

The review will complete a grant budget analysis after a review of the budget narrative.

- Request all 399 and 499 reports from the Comptroller's office for monitoring years being reviewed.
- Complete the form TOOL A: GRANT BUDGET ANALYSIS TOOL
- Analyze the information.

### *Contracts and Subawards*

The reviewer examines contracts and subawards to understand the relationship that the grant recipient has with third parties.

- Review copies of contracts and agreements to determine the type of relationship the primary grant recipient has with third-party recipients.
- Identify services that are subcontracted to another entity or any goods that are procured through contract.
- Make a preliminary assessment of whether the grant recipient has aligned with the right subrecipients to meet the grant's overall objective.
- When on-site or during a desk review, assess whether a competitive procurement was required for the grant.

## PRE-MONITORING REPORT SUMMARY

Each monitoring review will include a pre-monitoring report *before* the first day of the scheduled review. The purpose of the pre-monitoring report is to provide a general overview of the provider. Questionnaires has been created for each of the Federal and State Initiatives (FSI), AE, CTE section, the data team, and the appropriate grant manager for your provider. This allows each section the opportunity to address any areas of concern that may be useful to the monitoring team.

### *Components of a Pre-Monitoring Report Summary*

The critical components of the Pre-Monitoring Report Summary may include the following:

- ◆ Program performance towards statewide metrics
- ◆ Total grant award and unexpended balances for the monitoring years
- ◆ Which programs have been selected for monitoring
- ◆ Risk Matrix
- ◆ Program of Study information
- ◆ Audit history
- ◆ Student enrollment and achievement data
- ◆ Grants awarded

- ◆ Program location and administrative staff associated with the grants

## **PRE-VISIT ON-SITE MONITORING SCHEDULE**

Before finalizing a provider's monitoring visit dates, all providers are asked to verify that there will be no significant conflicts with on-campus events while the monitoring staff is on-site. Once monitoring dates are set, only extreme circumstances will be considered if a provider requests to change the dates of their monitoring process.

Request a room where your team will be "housed" for the duration of the trip. Ensure that this room can be locked, has internet access, and can serve as a location for private team meetings. Ideally, you will want one central location to conduct your entrance/exit conference, administrative interviews, and records review.

Request the contact information of individuals who will assist you with inventory searches throughout the district or college. In addition, you will want to have someone at each site to help you get into buildings and rooms.

Ensure that your travel times will be sufficient for bathroom breaks, lunch, potential traffic delays, etc.

Prepare a draft schedule that will include ample time to conduct all aspects of the monitoring process. Submit the draft schedule to your provider for review at least three weeks before your visit. Your provider may offer suggestions, but try to stick to a schedule that will best suit your team's needs while on-site.

Include the following items in your schedule:

- ◆ Contact information for all FDOE team members participating in the on-site visit
- ◆ Contact information for your provider
- ◆ Times and locations for the entrance/exit conference, administrative interviews, inventory searches, team meetings, etc.
- ◆ Names and addresses of all locations the monitoring team will visit while monitoring. Be sure to include contact information for the individual whom you will meet at each site.
- ◆ Estimated travel time between locations
- ◆ 1 hour for lunch
- ◆ Any other pertinent information that will be beneficial to the monitoring visit

Finalize the schedule with your provider at least two weeks before arrival.

*Note-any drastic changes to the schedule once on-site shall be reflected on your master schedule.*

## ON-SITE TRAVEL AND LOGISTICS

All travel reservations and requests should be submitted to the QAC director no later than **35 days** prior to an on-site monitoring visit. After the initial request is approved, the administrative assistant will prepare travel authorizations for all team members traveling to the on-site monitoring review. The administrative assistant must have all flight, hotel, and rental car information prior to submitting the travel authorization for approval.

- ◆ Reserve a rental car utilizing the State of Florida contract.
- ◆ Reserve the appropriate car class for pick up on the day you will begin your trip. In some instances, you may opt to pick the car up the Sunday evening before you leave. The rental car is to be returned upon arrival back to Tallahassee.
- ◆ Occasionally an additional rental car will be needed while on-site. Be sure to reserve the vehicle at a location in the city in which you are staying.
- ◆ In instances where the team will fly to the provider's location, please coordinate with the administrative assistant to secure flight reservations. In the event that you will be flying to your destination, be sure to reserve the rental car at the airport location at which you will arrive.
- ◆ Select hotel accommodations that will best serve your needs while away from Tallahassee. Be sure to follow the State of Florida travel guidelines for hotels and lodging. Also, take into account the following:
  - Proximity to provider
  - Amenities near the hotel
  - Proximity to highways and interstates
  - Secure and safe location
- ◆ In the event that hotel prices exceed the \$175/night threshold set by the State of Florida, you will be required to draft a justification memo to be submitted with your travel authorization. The justification memo should include the following:
  - The quoted hotel rate per night
  - Justification for why the specific hotel was selected
  - Comparative hotel rates in the area

If traveling somewhere with toll roads, you will be required to “check out” a Sun Pass transponder for toll fees. Generally, if you are traveling south of Interstate-10, you will want to request a Sun Pass transponder.

# ON-SITE/DESK MONITORING

## MANAGING THE GRANT RECIPIENT'S EXPECTATIONS

Managing expectations through communication starts prior to the review and continues through to the post-visit. The more the reviewer communicates, the more the grant recipient understands and knows what to expect, and the less apprehensive they are about the on-site or desk review. It is not possible to gather all the information from reports only or even during an on-site or desk review, and it is also not possible to identify every finding and area of concern. The on-site or desk review is expected to be conducted in an open and transparent manner that will allow for the reciprocal sharing of information and concerns.

The information reviewed during the pre-monitoring review, including the grants, tells an important story that is only further explained by communicating with the grant recipient. A review presents an opportunity for the reviewer to engage with the grant recipient and obtain context to support the data and information collected. It provides a deeper understanding of the state of the project, milestones, and challenges. Reviewers may also have the opportunity to review additional documents.

## ENTRANCE CONFERENCE

An entrance conference will be conducted at the beginning of each on-site or desk monitoring review. This should take place on the first day of your visit or travel or the first day of the desk monitoring review. Allow no more than one hour for the entrance conference. The entrance conference is an opportunity to manage the grant recipient's expectations by explaining the review process.

During the entrance conference, the reviewer should:

- ◆ Introduce the members of the review team;
- ◆ Reiterate the purpose of the review;
- ◆ Share the review agenda;
- ◆ Confirm logistics, if on-site;
- ◆ Initiate discussions on any perceived critical issues that were identified during the pre-monitoring document review; and
- ◆ Describe the monitoring process and timelines for the report and grant recipient response.

The entrance conference also provides an opportunity to let the grant recipient know that the reviewer will assist in its technical assistance needs. While compliance is essential, the reviewer should also look for context that helps connect the dots on the data already reviewed and provide technical assistance where there are gaps.

Upon completion of the entrance conference, you will provide your designated contact with the list of student names you had previously received from the Tallahassee data team. The student information will include academic records that will be verified during the review with the provider. Instruct the provider on what items are required to be submitted

for the student data verification process. Make sure to upload the instructions for the student data request to the provider's secure sharefile folder Core Activity 4-Data Accountability and Reporting.

### **USING ENTRANCE AND EXIT CONFERENCES AS GROUP DISCUSSIONS**

Reviewers may use the entrance and exit conferences as an opportunity for group interviews. Use entrance and exit conferences to gather information, promote conversations, and discover new issues that may not be apparent in traditional one-on-one interviews. Generally, it is advantageous for the reviewer to facilitate the discussion in the group and focus on open-ended questions. Refer to Appendix Resource D: Using Effective Interviewing Techniques for further guidance.

### **ON-SITE/DESK COMMUNICATIONS**

At the end of each day during the review, the reviewer can meet or call the appropriate grant recipient staff to update them on the reviewer's efforts and inform them of any potential issues identified. This provides the grant recipients with an opportunity to clarify or provide additional information regarding any identified issues or concerns. It also provides an excellent opportunity to discuss and jointly determine the causes of the issues and what corrective actions might be taken to resolve the issues and improve performance. These conversations ensure transparency, build trust, and prevent any surprises during the exit conference.

### **TECHNICAL ASSISTANCE**

Providing technical assistance is generally also a part of the reviewer's role during a monitoring review. The reviewer may be called to interpret the laws, rules, and regulations pertaining to the grant under review. The reviewer may also uncover trends or practices while reviewing documents and interviews that may trigger an immediate opportunity to provide technical assistance. In addition, the grant recipient may ask for help or guidance to improve its service design and delivery, grant operations, or administrative or financial management systems.

Unless the reviewer is positive of the answer, they should consult with Department staff before providing a definitive response.

### **FOUR Cs**

While the monitoring report and the findings within it are generally written post-visit, the reviewer must collect and process the information to facilitate writing clear and concise findings with corrective actions that fix the cause of the identified condition and prevent it from happening again. This is accomplished using a format for developing written findings known as the Four Cs: Condition, Cause, Criteria, and Corrective Action. Refer to Appendix Resource F: Monitoring Finding Template for further guidance.

- ◆ **CONDITION** is a clear, concise, and specific statement describing the violation of law, regulation, agency, national policy, etc. This statement serves as the topic sentence of a finding in a written monitoring report. The condition is identified through observations or interviews, analysis, and verification.

*Example – Describe problem:* No physical inventory was taken of equipment purchased with Perkins funds for the period from July 1, 2018, through September 30, 2020.

- ◆ **CAUSE** is a statement that explains why the condition occurred (or is occurring). For the purposes of the CMG, a cause is a person, thing, or event that produces an undesirable condition. Sometimes the cause is not easy to identify, especially if the grant recipient is unaware of or wishes to conceal problems. Reviewers must assess whether the evidence they gathered through interviews and reports provides a reasonable and convincing argument for why the stated cause is the key factor contributing to the condition.

*Example – Explain why the problem exists:* The lack of written procedures and delegation of duties has resulted in a lack of compliance.

- ◆ **CRITERIA** are the standards or legal requirements that are being violated. Criteria identify or prescribe the required or desired outcome with respect to the condition. Examples of criteria are laws, regulations, contracts, grant agreements, performance standards, business practices, benchmarks, and policies and procedures. With criteria, always cite the highest authority available first, then add lower-level authority if it adds clarity.

*Example – Specify regulation/policy:* 2 CFR 200.313(d)(2) requires that, at a minimum, a physical inventory must be taken and the results reconciled with the property records at least once every two years. (Rule 69I-72.006, Florida Administrative Code, requires once a fiscal year).

- ◆ **CORRECTIVE ACTIONS** are actions that eliminate the cause, correct or cure the condition and allow symptoms to disappear. An appropriate corrective action corrects the condition and prevents its recurrence. Corrective Actions use direct language, such as “shall” or “must,” and describe the specific documents needed to resolve the finding. Recommendations on detailed steps to correct the finding may be included when the reviewer is confident in knowing the cause of the problem and the appropriate remedy to fix it.

*Example – Discuss the action necessary to remedy a situation:* The Department recommends that the grant recipient develop and institute a new policy requiring, at a minimum, a biannual physical inventory of all grant-funded equipment. The provider must also conduct a physical count in the next six months and provide the QAC office with the results.

The results of the Four Cs are documented in a Corrective Action Plan.

Condition	Cause	Criteria	Corrective Actions
What is the specific problem or violation?	What is causing the condition?	What standard or requirement is being used to evaluate the condition?	What action is required to eliminate the cause and thus correct the condition?

**REASONABLE ASSURANCE**

Reasonable assurance is the confidence or comfort level that the reviewer gains from the grant recipient’s records and reports. The reviewer must use their professional judgment based on interviews, understanding of the grant’s operations, and testing performed to ascertain the grant recipient’s performance. The assurance that the reviewer obtains from answering the CMG questions and completing the modules supports the reviewer’s conclusion on the operations of the grant. Some questions in the CMG ask the reviewer to use their professional judgment to evaluate if a non-compliance issue is due to a specific, individual, or isolated factor or a systemic problem inherent in the grant recipient’s operations.

**COLLECTION OF DOCUMENTS**

The reviewer may find it helpful to record his/her notes and specific findings at the indicator level of the Core Activity so that, if questions arise later, the basis for the finding is on record. Any potential findings of compliance issues must be supported with evidence: observations and documents that demonstrate and support the finding. Such documentation becomes part of the monitoring file, at the reviewer’s option to make field notes in the CMG document or other methods (e.g., electronic files). The principal aim of the CMG is to help the reviewer organize his/her collection of notes and documents into a digital or hard copy file. It is suggested that the collection aligns with the objectives and indicators deemed relevant by FDOE for effective grant management purposes.

**EXIT CONFERENCE**

The exit conference is the opportunity to review the identified issues discussed with the grant recipient. In many instances, the reviewer may want to take back issues to management. The reviewer may take a closer review of the evidence and discuss it with staff and management as necessary.

The exit conference agenda should consist of items that have already been disclosed to the grant recipient during the daily discussions with staff. The reviewer should explain the issues concisely and hear out recipient responses and questions. Where the issue may result



in a finding, the reviewer should be prepared to explain how the Department's position is supported by rules, regulations laws, and policies.

The exit conference provides the grant recipient an opportunity to clarify any of the reviewer's issues during the review and a chance to rebut or correct any false conclusions or mistaken impressions the reviewer may have. Before concluding, the reviewer should explain whatever follow-up activities may be required of the recipient. In addition, documents or follow-up discussions may occur after the review but before the Final Report is completed.

## | TIP

Prior to the exit conference, it is best to keep your grant recipient updated on any issues identified during the review. The grant recipient should be informed of any issues prior to the official exit conference so that nothing brought up during the exit conference is a surprise. Everything that is to be contained in the monitoring report should be discussed during the exit conference. Any new information discovered during the post-review phase should be communicated to the grant recipient prior to issuing the report.

# POST-ON-SITE VISIT/DESK REVIEW

## MANAGING THE GRANT RECIPIENT'S EXPECTATIONS

Managing the grant recipient's expectations includes issuing an evidence-based monitoring report. The monitoring report is another form of timely communication and technical assistance provided to the grant recipient. The monitoring report provides a written version of the issues discussed in the exit conference, and no new findings or concerns should be contained in the report. A monitoring report should never catch a grant recipient by surprise.

## POST-VISIT ACTIVITIES

After the on-site visit or desk review, the reviewer should:

- ◆ Brief management and, if necessary, perform more in-depth research on issues identified during the on-site or desk review prior to finalizing and issuing the monitoring report.
- ◆ Draft the monitoring report to address all compliance findings, areas of concern, and observations identified during the review.
- ◆ Issue the monitoring report to the grant recipient within 45 business days for on-site reviews and 60 business days for desk reviews.
- ◆ Within 30 days of receiving the report back from the grant recipient, complete the monitoring report. Ensure all corrective action items are complete.
- ◆ Issue closure letter.
- ◆ Send completed monitoring report to Department web contact to post on Department's website.
- ◆ Ensure that the Grant (working) file is complete.
- ◆ Process all receipts from any Purchase Card payments.
- ◆ Complete the Department post-travel processes.

## KEY ELEMENTS OF A MONITORING REPORT

The monitoring report typically contains the following six elements:

- ◆ **Cover Letter** – The cover letter includes the dates of the review and programs covered and any response deadlines.
- ◆ **Executive Summary** – This section summarizes the promising practices, findings, areas of concern, or observations described fully in the report.
- ◆ **Review Scope** – This section outlines the following information:
  - Dates of review and the entrance/exit conferences
  - Sites visited
  - Names of Department staff members who conducted the review
  - Names and titles of those in attendance at the entrance/exit conferences
  - Purpose of the review
  - How a grant recipient was selected
  - Programs reviewed, if applicable
  - Periods for data covered in the review

- Documents reviewed
- Which core activities were reviewed

- ◆ **Background** – This section provides a piece of critical background information about the grant. The background should only contain information that the reader may not have readily available or provide context for information presented later in the report. The background section may include a list of grants awarded, funding amount, and unexpended fund amounts.
- ◆ **Findings** – This section lists each finding using the four Cs to fully identify the issue and its resolution.
- ◆ **Corrective Action Plan** – The Corrective Action Plan (CAP) will include the four C's and a section for grant recipient response, responsible party, and anticipated completion date.

TIP: Findings

Compliance findings do not exist unless an authority (e.g., statute, rule, program regulation) has been violated.

## EVIDENCE-BASED MONITORING REPORT

Writing an evidence-based report requires the ability to write with clarity and the ability to organize the evidence collected and report the facts so that the report is useful information for the grant recipient. At times, the reviewer is the sole author. In other situations, the monitoring report is produced through the collective effort of staff.

In all cases, writers should:

- ◆ **Use clear topic sentences.** Specifically, state the paragraph's main idea. In most instances, the topic sentence is the first sentence of the paragraph. The Findings section of the report describes the Condition. Stating the main idea in a topic sentence helps the author stay on topic and focus the main idea in the reader's mind.
- ◆ **Use an active voice whenever possible.** Active voice sentences generally follow a subject + verb + object format and have more impact. They give readers a more precise explanation of conditions and criteria.

Editing Checklist – For each finding:

- ◆ Is the condition clearly stated?
- ◆ Is the cause included in the finding?
- ◆ Are the criteria correctly defined based on the applicable law or regulation?
- ◆ Is the corrective action clearly described, including identifying specific documents needed to resolve or support resolution?
- ◆ Does the corrective action address the cause of the condition?

Editing Checklist – For the comprehensive report:

- ◆ Is the report organized? Are the main ideas prioritized in order of importance?
- ◆ Does the report only include the necessary information to support the findings and observations?
- ◆ Are the four Cs included in each finding?
- ◆ Does the topic sentence of each finding and area of concern clearly and concisely describe the condition?
- ◆ Will the reader understand how to give an appropriate response related to findings and recommendations?

## GRANT (WORKING) FILE

The reviewer should organize a grant (working) file that contains documents such as the completed sections of the CMG, CMG tools, correspondence, pre-visit report, the monitoring report with a corrective action plan, and any documents collected during the review. The file is to be saved in the QAC shared folder. The grant file should include notes that assist the reviewer during the resolution process. It is critical that any potential compliance issues identified on-site be supported with copies of documents that demonstrate and support the finding. This is especially true for questioned costs.

Findings of non-compliance that include questioned costs require special attention. Questioned costs are Federal funds expended in violation of provisions of the applicable laws, regulations, or award terms, or an expenditure that is not supported by adequate documentation to show that it is an allowable cost. Questioned costs also include what appear to be unreasonable costs, even if they are not specifically unallowable.

## **RESOLUTION PROCESS**

Each finding identified in the monitoring report must have a corresponding corrective or required action. The grant recipient must document the correction and send sufficient evidence to resolve the finding. The recipient will be required to produce a Corrective Action Plan (CAP). If the reviewer does not accept the documentation, the grant recipient's response should explain why the documentation was not accepted and what other documentation is needed for resolution.

If the grant recipient provides a CAP as a response to findings, the reviewer should review and approve each CAP submission. Well-developed CAPs identify actions that address the cause and provide a timeline for implementing the changes. After the CAP is approved, the grant recipient should communicate at regular intervals to report its progress in implementing the changes. The reviewer should provide any technical assistance that is needed. CAPs must be tracked until all findings are resolved. When resolving questioned costs, it is essential to take prompt action.

## **CONCLUSION**

The reviewer uses the CMG to support their review of the grant operations, financial systems, and policies and procedures generally applicable to federally funded grant activities. Questions regarding monitoring the program and the issuance of findings should be forwarded to the director of QAC.

# CORE ACTIVITIES

## GENERAL INSTRUCTION

### INTRODUCTION TO THE CORE ACTIVITIES

The achievement of the Department's Mission, Vision and Guiding Principles is premised on the delivery of high-quality, outcome-focused effective grant agreements with State and local education systems and ensures that the Department's oversight and monitoring practices reinforce these principles while ensuring program outcomes are achieved and a high level of integrity is maintained.

The Core Monitoring Guide focuses on the programmatic, administrative, and financial requirements applicable to all federal grant recipients, specifically in five core areas for monitoring: Career and Technical Education, Adult Education, Financial Management, Data Accountability, Reporting and CARES Act.

### HOW TO USE THE CORE ACTIVITIES

There are essential core functions in place for any grant recipient to operate a federal grant within the boundaries of acceptable practices established primarily by law, regulation, and government-wide rule. Since this CMG is *generic*, it is intended to examine the grant recipient's readiness and capacity to operate the grant. The guide's generic quality also means that the legislative authority for compliance requirements is limited to those requirements applicable to most federal grants. These are typically found in OMB's UGG; Perkins V; WIOA and related applicable Federal, State, and local laws and regulations governing a program or grant; and the terms and conditions specific to each grant. Due to the generic quality of the CMG, the QAC section may customize the guide to meet the monitoring objectives, and timeline or address the grant's riskier areas. Any supplements to the CMG will include citations as well as updates based on changing requirements of the UGG, Perkins V, WIOA, applicable Federal and State laws, and Federal and State policy guidance.

### DETERMINING COMPLIANCE AND EFFECTIVENESS OF CORE ACTIVITY INDICATORS

In preparation for monitoring the Core Activities, the reviewer should become familiar with all the particular grant type requirements to determine which objectives and indicators are compliance requirements. As previously discussed, indicators accompany each objective. The indicators are the criteria that are used to determine that the objective or requirement is being met. The indicators are labeled (C) for compliance that must be met or (E) for effectiveness that may result in an area of concern or a finding later if not addressed. If a compliance indicator is not met, it results in a finding.

The questions for review and discussion in each Core Activity are designed to help the reviewer determine the presence of the indicator(s), identify the attributes or criteria of the Core Activity's objectives, and assess whether the grant objectives are being met. In some instances, the objectives or indicators may not apply to the

specific grant under review. Based on a review of the indicator(s), the reviewer should determine if each indicator has been met. Resources and tools found in the Appendix will help reviewers perform an in-depth review of indicators and assist them when documenting answers to Core Activities questions.

The instructions for Core Activities 1-5 list documents to review to determine whether it is a compliance or effectiveness indicator or both. Based upon applicable documents to determine compliance, if the indicator is a compliance issue for the grant under review, the reviewer completes the appropriate citation.

# CORE ACTIVITY 1

## CAREER AND TECHNICAL EDUCATION



**Career and Technical Education (CTE) is a modern approach to higher education and training. CTE has seventeen career pathways to choose from and hundreds of short-term, in-demand programs available.**

The Perkins program is the primary federal investment in career and technical education at secondary and postsecondary levels. The latest iteration of Perkins, known as Perkins V, was signed into law in 2018 as the Strengthening Career and Technical Education for the 21st Century Act (SCATE). The Act, which took effect July 1, 2019, amends the Carl D. Perkins Career and Technical Education (Perkins IV) Act of 2006 and reauthorizes Perkins for six years. The Act’s purpose “to develop more fully the academic knowledge and technical and employability skills of secondary education students and postsecondary education students who elect to enroll in CTE programs and programs of study.”

Each state participating in the federal Perkins program must submit a four-year plan outlining the state’s approach to implementing the Act. The US Department of Education approved Florida’s Perkins Four-Year State Plan in June of 2020. The Plan outlines Florida’s commitment to providing all students the opportunity to participate in quality career and technical education (CTE) programs that lead to in-demand occupations. (Links to Florida’s State Plan and an Executive Summary of the Plan are below.)

Each year, Florida receives approximately 73 million dollars (pending annual allocations) through the Perkins program. The bulk of the funds go directly to eligible agencies (school districts and Florida College System institutions) through annual entitlement grants, as well as competitive grants which have in the past included support for entrepreneurship education, agencies serving rural areas, students in the Department of Juvenile Justice facilities, and college career pathways.

### Florida’s Perkins V State Plan

- [Executive Summary of Florida’s 2020-2024 State Plan](#) (PDF)
- [Florida’s 2020-2024 State Plan](#) (PDF)



## INTRODUCTION

The purpose of Core Activity 1 is to evaluate the grant recipient's CTE programs. Core Activity 1 is dissected into five objectives to help the reviewer determine the grant recipient's compliance and effectiveness. Each grant or program may have different requirements, and the reviewer must carefully examine each objective and its indicators to determine whether it applies to the grant being monitored.

Objective 1.a: Accountability: The grant recipient has conducted all CTE activities in accordance with State and federal requirements.

Objective 1.b: Local Application: The grant recipient has planned to provide sufficient, comprehensive local needs assessment

Objective 1.c: Local Use of Funds: The grant recipient has used grant funds to support CTE programs and staff.

Objective 1.d: Leadership Activities: The grant recipient has used grant funds to promote student access to high-quality programs and initiatives.

Objective 1.e: Student Organizations: The grant recipient has used funds for a Career and Technical Student Organization (CTSO).

## INSTRUCTIONS

Indicators in Core Activity 1 are marked with a (C/E), indicating it could be either a compliance indicator, an effectiveness indicator, or both, depending on the program and the grant's specific requirements under review. Review each objective and the documentation provided.

- ◆ The reviewer looks at each of the objectives and indicators to determine if applicable to the grant/program under review.
- ◆ If a further review of any of these systems is necessary based on the reviewer's findings, obtain copies of all documents relevant to the reviewer's conclusions to share with management as appropriate.
- ◆ If a compliance indicator is not met, it will result in a finding due to a violation (condition) of a specific compliance requirement in law, regulations, UGG, national policies, Grant Terms and Conditions, federal policy guidance, and/or the grant agreement. Negative responses to an indicator will lead to a determination of noncompliance. Collect evidence as adequate documents must support written findings and be contained in the review file.



## Objective 1.a: Accountability

*The grant recipient has conducted all Career and Technical Education activities in accordance with State and federal requirements.*

### (C/E) Indicator 1.a: Accountability

**Citation:** FDOE Green Book, Perkins V Sec. 124(1) (c), Perkins V Sec. 113, Section 1004.91(2), F.S.Rule 6A-6.014, FAC, 2 CFR 200.328, State of Florida Perkins V State Plan, Section 1004.91(3), FS.

#### Instructions:

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Documents provided by the grant recipient for this objective
- Evaluate if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement

#### Questions for Review and Discussion

1. Does the eligible provider use approved student assessment systems upon a student's enrollment into a CTE program? Is the grant recipient's strategic approach aligned with the State/Local Workforce Board's priorities for meeting the State or local area's workforce and economic needs?
2. Does the eligible provider require basic skills requirements for entry into a CTE program? How do the strategic plan goals and objectives align with the goals of the grant?
3. Does the eligible provider have written procedures for collecting, verifying, analyzing, and reporting student data?
4. Does the eligible agency offer CTE programs that adhere to the approved Florida Curriculum Frameworks?
5. Does the eligible provider have policies and procedures on exemptions and services for students with disabilities?
6. Does the eligible agency use an electronic management information system that adheres to the requirements?
7. Does the eligible agency have specific staff responsible for data collection, entry, and student data verification?
8. Does the eligible provider adhere to federal and state records retention policies?
9. Does the eligible provider offer specialized CTE training and professional development to teachers, faculty, support personnel, or other paraprofessionals?

Core Activity 1- Career and Technical Education  
Objective 1.a - Accountability

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the provider offer CTE programs that adhere to the approved Florida Curriculum Frameworks? For apprenticeship-related instruction, is the instruction associated with a valid state reportable CIP number?	C	<u>Florida's Perkins V State Plan</u>	<ul style="list-style-type: none"> <li>Completed Perkins Program of Study <i><u>protocol</u></i></li> </ul>	
2. Does the provider have policies and procedures on exemptions and services for students with disabilities?	C	<u>Florida's Perkins State Plan Section 1004.91(3), FS.</u>	<ul style="list-style-type: none"> <li>Policies and procedures</li> <li>List of services and programs for students with self-declared disabilities</li> </ul>	
3. Does the provider adhere to federal and state records retention policies?	C	<u>2 CFR 200.334 Federal FDOE Green Book Section C Fiscal and Program Accountability</u>	<ul style="list-style-type: none"> <li>Policies and procedures</li> </ul>	
4. Does the provider offer CTE professional development per the regulations?	C	<u>Perkins V Section 124(1)(c)</u>	<ul style="list-style-type: none"> <li>Staff training and professional development records/documentation, training materials, etc.</li> </ul>	



## Objective 1.b:

### Local Application

*The grant recipient has planned to provide sufficient, comprehensive local needs assessment.*

#### **(C/E) Indicator 1. b: Local Application**

**Citation:** Perkins V Sec. 134, WIOA Sec. 121; FDOE RFA; GEPA

#### **Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 1. b Local Application
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### **Questions for Review and Discussion**

1. Did the eligible provider include at least one program of study in their most recent grant application?
2. Did the eligible provider collaborate with the local workforce development board and other local workforce agency?
3. Does the eligible provider work to improve the academic and technical skills of students?
4. What work-based learning opportunities does the provider offer to students in CTE?
5. How does the eligible provider work with employers to develop or improve these work-based learning opportunities?
6. Does the provider offer students currently enrolled in high school the opportunity to earn postsecondary CTE credits?
7. How does the provider support the recruitment, preparation, retention, and training of CTE instructors and administrative staff?
8. Did the provider conduct a comprehensive local needs assessment (CLNA) and include the results of the CLNA in the local application?
9. Does the provider only use Perkins funds to support programs identified within the CLNA?
10. Do programs supporting Perkins funds meet Florida's size, scope, and quality (SSQ) Standards?
11. Does the provider conduct ongoing consultation with stakeholders to discuss updates to the CLNA, labor market alignment, implementation of programs and programs of study, implementation of work-based learning, and local resources coordination?

Core Activity 1- Career and Technical Education  
Objective 1.b – Local Application for CTE

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>1. Did the provider conduct a comprehensive local needs assessment (CLNA), and include the results of the CLNA in the local application?</p> <p>Did the CLNA include the following:</p> <p>a. An evaluation of the performance of the students served by the eligible provider with respect to State determined and local levels of performance established pursuant to Sec. 113, including an evaluation of performance for special populations and each subgroup described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965;</p> <p>b. A description of how career and technical education programs offered by the eligible provider are sufficient in size, scope, and quality to meet the needs of all students served by the eligible recipient;</p> <p>c. A description of how career and technical education programs offered by the eligible provider are (I) aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board described in Sec. 101 of the Workforce Innovation and Opportunity Act or local workforce development board, including career pathways, where appropriate; or (II) designed to meet local education or economic needs not identified by State boards or local workforce development boards;</p>	C	<p><u>Perkins Sec. 134(b)(1)</u> page 50</p> <p>Perkins Sec. 134(c)(2)</p>	<ul style="list-style-type: none"> <li>• Sample of 10% selected supporting documentation for the CLNA submitted to FDOE from the most recent grant application. (Request made by Lead Reviewer.)</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>d. An evaluation of progress toward the implementation of career and technical education programs and programs of study;</p> <p>e. A description of how the eligible recipient will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions; and</p> <p>f. A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including: (i) strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations; (ii) providing programs that are designed to enable special populations to meet the local levels of performance; and (iii) providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.</p>				
<p>2. Does the provider only use Perkins funds to support programs identified within the CLNA?</p>	C	<p><u>Perkins Sec. 134(c)</u> Page 52</p>	<ul style="list-style-type: none"> <li>List of programs supported by Perkins funds. Financial documents to support expenditures on approved programs</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
			(Request made by Lead Reviewer)	
<p>3. Did the provider, at a minimum, consult with the following stakeholders:</p> <ol style="list-style-type: none"> <li>Representatives of CTE programs in a local education agency or educational service agency;</li> <li>Representatives of CTE programs at the postsecondary level;</li> <li>Representatives of the State board or local workforce development boards and a range of local or regional businesses or industries;</li> <li>Parents and student;</li> <li>Representatives of special populations;</li> <li>Representatives of agencies serving out of school youth, homeless children and youth, and at risk youth;</li> <li>Representatives of Native Tribes and Tribal organizations; and</li> <li>Any other stakeholders that the eligible agency may require the provider to consult.</li> </ol>	C	<p><u>Perkins Sec. 134(d)</u> Page 53</p>	<ul style="list-style-type: none"> <li>Stakeholder engagement tool</li> <li>List of stakeholders the provider consulted with</li> <li>Stakeholder committee meeting records: sign-in sheet, agenda, minutes, etc.</li> </ul>	
<p>4. Does the provider conduct ongoing consultation with stakeholders to discuss updates to the comprehensive local needs assessment, labor market alignment, implementation of programs and programs of study, implementation of work-based learning, and the coordination of</p>	C	<p><u>Perkins Sec. 134(e)</u> Page 53</p>	<p>Records of most recent ongoing stakeholder committee meeting records: sign-in sheet, agenda, minutes.</p>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
local resources?				
5. Did the eligible provider include at least one program of study in their most recent grant application?	C	<u>Perkins Sec. 134(b)(2)</u>	Program of Study included with the provider's most recent grant application	
6. Did the eligible provider collaborate with the local workforce development board and other local workforce agencies to provide: <ul style="list-style-type: none"> <li>a. Career exploration and career development coursework, activities or services;</li> <li>b. Career information on employment opportunities that are high-skill, high-wage or in-demand as determined by your comprehensive local needs assessment; and</li> <li>c. An organized system of career guidance and academic counseling before enrolling and while participating in CTE programs.</li> </ul>	C	<u>WIOA Sec. 121(e)(2)</u> page 58 <u>Perkins Sec. 134(b)(3)</u>	<ul style="list-style-type: none"> <li>• List of location(s) and services provided by the LWDB to assist in CTE career exploration, development, and professional development</li> <li>• System of academic advisement to potential and current CTE students</li> <li>• LWDB MOU</li> </ul>	
7. Does the eligible provider work to improve students' academic and technical skills 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 core academic subjects and	C	<u>Perkins Sec. 134(b)(4)</u>	<ul style="list-style-type: none"> <li>• Sample academic plan(s) for CTE students</li> <li>• CTE and academic course listings</li> <li>• Curriculum Maps (secondary)</li> <li>• Lesson Plans</li> <li>• Program catalog descriptions</li> </ul>	



Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
career and technical education subjects.			<ul style="list-style-type: none"> <li>• Curriculum and curriculum maps</li> <li>• Instructional materials</li> <li>• Academic support services</li> <li>•</li> </ul>	
<p>8. How did the provider ensure the following:</p> <p>a. Prepare special populations (described in Perkins Section 3 (48) special population 9 categories a-I: (A) individuals with disabilities; (B) individuals from economically disadvantaged families, including low-income youth and adults; (C) individuals preparing for non-traditional fields; (D) single parents, including single pregnant women; (E) out-of-workforce individuals; (F)English learners ; (G) homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 USC 11434a); (H) youth who are in, or have aged out of, the foster care system; and (I) youth with a parent who—(i) is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code); and (ii) is on active duty (as such term is defined in section 101(d)(1) of such title.</p> <p>b. for high-skill, high wage or in-demand industry sectors or occupations;</p> <p>c. Prepare participants for non-traditional fields;</p>	C	<p><u>Perkins Sec. 134 (b) (5)</u> page 51 <u>FDOE RFA</u></p>	<ul style="list-style-type: none"> <li>• At a minimum, Policy and Procedure</li> <li>• Advisor Board</li> <li>• Specialized recruitment and outreach to address this population and subgroups</li> <li>• Examples of social media, brochures, fairs, parent's nights</li> <li>• Examples of activities including competitions, work-study programs, and internships.</li> </ul>	Verify how the nine special populations are being addressed.

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>d. Provide equal access for special populations; and Ensure that members of special populations are not discriminated against</p>				
<p>9. What work-based learning opportunities does the provider offer to students in CTE? How does the eligible provider work with employers to develop or improve these work-based learning opportunities?</p>	<p>C</p>	<p><u>Perkins Sec. 134(b)(6)</u> Page 51</p>	<ul style="list-style-type: none"> <li>• Apprenticeship and internship agreements with local employers</li> <li>• OJT student's Training agreements.</li> <li>• Student enrollment in courses that fulfill the WBL component of the CTE Graduation Pathway option.</li> <li>• Documentation of student participation in a school-based enterprise as part of a CTE course or program.</li> <li>• MOU or training agreement for Clinicals/Practicums</li> <li>• Virtual or Simulated WBL. Can provide the program/tool or provide scenarios that simulate the actual workplace.</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
10. Does the provider offer students currently enrolled in high school the opportunity to earn postsecondary CTE credits?	C	<a href="#">Perkins Sec. 134 (b) (7)</a>	<ul style="list-style-type: none"> <li>• Dual Enrollment agreement(s) between secondary or postsecondary CTE providers</li> <li>• Student requirements to participate in Dual Enrollment programs</li> <li>• Utilized Statewide articulation agreement</li> </ul>	
11. How does the provider support the recruitment, preparation, retention and training of CTE instructors and administrative staff?	C	<a href="#">Perkins Sec. 134(b)(8)</a>	<ul style="list-style-type: none"> <li>• Recruitment documents</li> <li>• Training records: dates, sign-in sheets, topics of discussion, training materials, etc.</li> </ul>	
12. Has FDOE required the provider to conduct a CTE Program Improvement Plan based on the most recent data?	C	<a href="#">Perkins Sec. 134(b)(9)</a>	Information provided by FDOE Perkins Program staff	
13. How does the provider ensure equitable access to, and participation of students, teachers and other program beneficiaries with special needs?	C	<a href="#">General Education Provisions Act (GEPA)</a>	<ul style="list-style-type: none"> <li>• GEPA statement</li> </ul> <p>Examples of services and/or efforts to ensure equitable access to individuals with disabilities</p>	
14. Did you start any new programs?	E		<ul style="list-style-type: none"> <li>• Approved program list</li> </ul>	
15. Did you have any students enrolled in the startup program(s)?	E		<ul style="list-style-type: none"> <li>• Data to support enrollment</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
16. How much did you have to spend to start up this new program?	E		<ul style="list-style-type: none"> <li>Financial documents to support expenditures</li> </ul>	



## Objective 1.c: Local Use of Funds

*The grant recipient has used grant funds to support Career and Technical Education programs and staff.*

### **(C/E) Indicator 1.c: Local Use of Funds**

**Citation:** Perkins V Sec 135, Perkins V Sec. 215, Perkins V Sec 124

#### **Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 1.c Local Use of Funds
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### **Questions for Review and Discussion**

1. How does the provider offer career exploration and career development activities for students before enrolling and while participating in CTE programs?
2. What aspects of the grant will continue after the grant ends?
3. Does the provider offer staff development and training to support CTE programs and services?
4. What functions, services, and activities are critical to sustaining grant outcomes (i.e., case management, supportive services, etc.)? What resources have been identified to sustain program operations (i.e., allocated staff, training funds, etc.)?
5. Does the provider support the implementation of CTE programs and programs of study that result in increasing student achievement at the local levels of performance?
6. Does the provider offer CTE program offerings to all eligible students under Perkins law?

Core Activity 1- Career and Technical Education

Objective 1.c – Local Use of Funds

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>1. How does the provider offer career exploration and career development activities for students before enrolling and while participating in CTE programs that may include:</p> <ul style="list-style-type: none"> <li>a. introductory courses or activities focused on career exploration and career awareness, including non-traditional fields;</li> <li>b. readily available career and labor market information, including information on (i) occupational supply and demand; (ii) educational requirements; (iii) other information on careers aligned to State, local, or Tribal (as applicable) economic priorities; and (iv) employment sectors;</li> <li>c. programs and activities related to the development of student graduation and career plans;</li> <li>d. career guidance and academic counselors that provide information on postsecondary education and career options;</li> <li>e. any other activity that advances knowledge of career opportunities and assists students in making informed decisions about future education and employment goals, including non-traditional fields; <b>or</b></li> <li>f. providing students with strong experience in, and comprehensive</li> </ul>	C	Perkins Sec. 135(b)(1)	<ul style="list-style-type: none"> <li>• Coordination of student outreach programs (open house, information night, student advising session (postsecondary))</li> <li>• Career and Student Technical Organization roster(s)</li> <li>• Student training(s)</li> <li>• Guidance counselor training on CTE program offerings</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>understanding of, all aspects of an industry?</p>				
<p>2.Does the provider offer staff development and training to support CTE programs and services that may include:</p> <ol style="list-style-type: none"> <li>a. professional development on supporting individualized academic and career and technical education instructional approaches;</li> <li>b. professional development on ensuring labor market information is used to inform the programs, guidance, and advisement offered to students;</li> <li>c. providing CTE personnel with opportunities to advance knowledge, skills and understanding of all aspects of an industry, including the latest workplace equipment, technologies, standards and credentials;</li> <li>d. supporting school leaders and administrators in managing CTE programs;</li> <li>e. supporting the implementation of strategies to improve student achievement and close gaps in student participation and performance in career and technical education programs;</li> <li>f. providing CTE personnel, as appropriate, with</li> </ol>	<p>C</p>	<p>Perkins Sec. 135(b)(2) Perkins V Section 124(1)(c)</p>	<ul style="list-style-type: none"> <li>• Schedule of CTE trainings offered</li> <li>• Training records: dates, sign-in sheets, topics of discussion, training materials, etc. Web postings of training opportunities</li> <li>• Schedule of online trainings</li> <li>• List of staff participating in state CTE training(s)</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>opportunities to advance knowledge, skills, and understanding in pedagogical practices, including, to the extent the eligible provider determines that such evidence is reasonably available, evidence-based pedagogical practices;</p> <p>g. training, as appropriate, to provide appropriate accommodations for individuals with disabilities, and students with disabilities who are provided accommodations under the Rehabilitation Act of 1973 or the Individuals with Disabilities Education Act;</p> <p>h. training in frameworks to effectively teach students, including a particular focus on students with disabilities and English learners, which may include universal design for learning, multi-tier systems of supports and positive behavioral interventions and support; or</p> <p>i. training for the effective use of community spaces that provide access to tools, technology, and knowledge for learners and entrepreneurs, such as makerspaces or libraries?</p>				



Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>3.Does the provider support the implementation of CTE programs and programs of study that result in increasing student achievement of the local levels of performance established under section 113, which may include:</p> <ol style="list-style-type: none"> <li>a. a curriculum aligned with the requirements for a program of study;</li> <li>b. sustainable relationships among education, business and industry, and other community stakeholders, including industry or sector partnerships in the local area;</li> <li>c. where appropriate, expanding opportunities for CTE concentrators to participate in accelerated learning programs including dual or concurrent enrollment programs, early college high schools, and the development or implementation of articulation agreements as part of a career and technical education program of study;</li> <li>d. appropriate equipment, technology, and instructional materials (including support for library resources) aligned with business and industry needs;</li> <li>e. a continuum of work-based learning opportunities, including simulated work environments;</li> <li>f. industry-recognized certification examinations or other assessments leading</li> </ol>	C	Perkins Sec. 135(b)(5)	<ul style="list-style-type: none"> <li>• Advisory Committee records</li> <li>• Dual Enrollment agreement(s) between secondary and/or postsecondary CTE providers</li> <li>• Inventory listing</li> <li>• Recruitment documents</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>toward a recognized postsecondary credential;</p> <ul style="list-style-type: none"> <li>g. efforts to recruit and retain career and technical education program teachers, faculty and personnel;</li> <li>h. where applicable, coordination with other education and workforce development programs and initiatives;</li> <li>i. expanding opportunities for students to participate in distance CTE and blended-learning programs;</li> <li>j. expanding opportunities for students to participate in competency-based education programs;</li> <li>k. improving career guidance and academic counseling programs that assist students in making informed academic and CTE decisions, including academic and financial aid counseling;</li> <li>l. supporting the integration of employability skills into a career and technical education programs and programs of study;</li> <li>m. supporting programs and activities that increase access, student engagement, and success in STEM fields (including computer science and architecture) for students who are members of groups underrepresented in such subject fields;</li> <li>n. providing career and technical education, in a school or other educational setting, for adults or out-of-school youth;</li> </ul>				

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<ul style="list-style-type: none"> <li>o. supporting career and technical student organizations;</li> <li>p. making all forms of instructional content widely available, which may include use of open educational resources;</li> <li>q. supporting the integration of arts and design skills, when appropriate, into CTE programs and programs of study;</li> <li>r. partnering with a qualified intermediary to improve training, the development of public-private partnerships, systems development, capacity-building, and scalability of the delivery of high-quality CTE;</li> <li>s. support to reduce or eliminate out-of-pocket expenses for special populations participating in career and technical education; or</li> <li>t. other activities to improve career and technical education programs</li> </ul>				



## **Objective 1.d: Leadership Activities**

*The grant recipient has used grants funds to promote student access to high-quality programs and initiatives.*

### **(C/E) Indicator 1.d: Leadership Activities**

**Citation:** Perkins V. Section 124

#### **Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 1.d Leadership Activities
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### **Questions for Review and Discussion**

1. Does the provider use leadership funds to establish partnerships among local educational agencies, higher education institutions, AE providers, Indian Tribes, and Tribal organizations?
2. Does the provider use leadership funds to provide high-quality, comprehensive professional development for CTE teachers, faculty, specialized instructional support personnel, and paraprofessionals?
3. Does the provider use leadership funds to award incentive grants to eligible recipients?
4. Does the provider use leadership funds to create, implement, and support pay-for-success initiatives leading to a recognized postsecondary credential?
5. Does the provider use leadership funds to support CTE programs for adults and out-of-school youth concurrent with completing their secondary school education in a school or other educational setting?
6. Does the provider use leadership funds to improve career guidance and academic counseling programs that assist students in making informed academic and CTE decisions, including academic and financial aid counseling?
7. Does the provider use leadership funds to support CTSO with respect to efforts to increase the participation of students in nontraditional fields and students who are members of special populations?

Core Activity 1- Career and Technical Education  
Objective 1.d – Leadership Activities

Question	C / E	Citation(s)	Check Yes or No to answer the question.	Notes for further clarification
1. Does the leadership grant authorize funds to assist in developing statewide programs of study, including standards, curriculum, course development, career exploration, guidance, and advisement activities and resources?	C	<u>Perkins Sec. 124(b)(1)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2. Does the provider use leadership funds assist in approving locally developed programs of study that meet requirements established in Section 122(d)(4)(B)?	C	<u>Perkins Sec. 124(b)(2)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3. Does the provider use leadership funds to assist in establishing statewide articulation agreements aligned with approved programs of study?	C	<u>Perkins Sec. 124(b)(3)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4. Does the provider use leadership funds to establish partnerships among local educational agencies, institutions of higher education, adult education providers, Indian Tribes and Tribal organizations to: <ul style="list-style-type: none"> <li>a. develop and implement programs of study aligned to State and local economic and education needs;</li> <li>b. facilitate the establishment, expansion, and integration of opportunities for students at the secondary level; <b>and</b></li> <li>c. facilitate work-based learning opportunities (including internships, externships, and simulated work environments) into programs of study?</li> </ul>	C	<u>Perkins Sec. 124(b)(4)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Question	C / E	Citation(s)	Check Yes or No to answer the question.	Notes for further clarification
<p>5. Does the provider use leadership funds to provide high-quality, comprehensive professional development for CTE teachers, faculty, specialized instructional support personnel and paraprofessionals that:</p> <ul style="list-style-type: none"> <li>a. integrates state academic standards and relevant technical knowledge and skills;</li> <li>b. prepares them to provide appropriate accommodations for students who are members of special populations; <b>and</b></li> <li>c. increases the ability of those providing CTE instruction to stay current with industry standards and earn an industry-recognized credential or license?</li> </ul>	C	<u>Perkins Sec. 124(b)(5)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<p>6. Does the provider use leadership funds to promote student access to high-quality programs of study that provide skill development; and access to effective teachers, faculty, specialized instructional support personnel and paraprofessionals?</p>	C	<u>Perkins Sec. 124(b)(6)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<p>7. Does the provider use leadership funds to award incentive grants to eligible recipients:</p> <ul style="list-style-type: none"> <li>a. for exemplary performance in carrying out programs under Perkins</li> <li>b. under permission from Perkins Sec. 135(c)?</li> </ul>	C	<u>Perkins Sec. 124(b)(7)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<p>8. Does the provider use leadership funds to support:</p>	C	<u>Perkins Sec. 124(b)(8)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Question	C / E	Citation(s)	Check Yes or No to answer the question.	Notes for further clarification
<p>a. the adoption and integration of recognized postsecondary credentials and work-based learning into programs of study, and for increasing data collection associated with recognized postsecondary credentials and employment outcomes</p> <p><b>or</b></p> <p>b. consultation and coordination with other State agencies to identify and examine licenses or certifications that pose an unwarranted barrier to entry into the workforce for CTE students <b>and</b> do not protect the health, safety, or welfare of consumers?</p>				
<p>9. Does the provider use leadership funds to create, implement and support pay-for-success initiatives leading to a recognized postsecondary credential?</p>	C	<u>Perkins Sec. 124(b)(9)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<p>10. Does the provider use leadership funds to support CTE programs for adults and out-of-school youth concurrent with completing their secondary school education in a school or other educational setting?</p>	C	<u>Perkins Sec. 124(b)(10)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<p>11. Does the provider use leadership funds to create, evaluate and support competency-based curricula?</p>	C	<u>Perkins Sec. 124(b)(11)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<p>12. Does the provider use leadership funds to support the development, implementation and expansion of programs of study or career pathways in</p>	C	<u>Perkins Sec. 124(b)(12)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Question	C / E	Citation(s)	Check Yes or No to answer the question.	Notes for further clarification
areas declared to be in a state of emergency?				
13. Does the provider use leadership funds to partner with qualified intermediaries to improve training, public-private partnerships, systems development, capacity-building and scalability of the delivery of high-quality career and technical education?	C	<u>Perkins Sec. 124(b)(13)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
14. Does the provider use leadership funds improve career guidance and academic counseling programs that assist students in making informed academic and career and technical education decisions, including academic and financial aid counseling?	C	<u>Perkins Sec. 124(b)(14)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
15. Does the provider use leadership funds to support the integration of employability skills into CTE programs and programs of study?	C	<u>Perkins Sec. 124(b)(15)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
16. Does the provider use leadership funds to: a. support programs and activities that increase access, student engagement and success in STEM fields (including computer science, coding and architecture)? b. support the integration of arts and design skills, and support for hands-on learning, particularly for students who are members of underrepresented groups such as female students, minority students and	C	<u>Perkins Sec. 124(b)(16)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	



Question	C / E	Citation(s)	Check Yes or No to answer the question.	Notes for further clarification
students who are members of special populations?				
17. Does the provider use leadership funds to support career and technical student organizations (CTSO) concerning efforts to increase the participation of students in nontraditional fields and students who are members of special populations?	C	<u>Perkins Sec. 124(b)(17)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
18. Does the provider use leadership funds to support establishing and expanding work-based learning opportunities aligned to CTE programs and programs of study?	C	<u>Perkins Sec. 124(b)(18)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
19. Does the provider use leadership funds for the integration and alignment of programs of study and career pathways?	C	<u>Perkins Sec. 124(b)(19)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
20. Does the provider use leadership funds to support the use of CTE programs and programs of study aligned with State, regional or local high-skill, high-wage, or in-demand industry sectors?	C	<u>Perkins Sec. 124(b)(20)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
21. Does the provider use leadership funds to make all forms of instructional content widely available, including open educational resources?	C	<u>Perkins Sec. 124(b)(21)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
22. Does the provider use leadership funds to develop valid and reliable assessments of competencies and technical skills and enhancing data	C	<u>Perkins Sec. 124(b)(22)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Question	C / E	Citation(s)	Check Yes or No to answer the question.	Notes for further clarification
systems to collect and analyze data?				
23. Does the provider use leadership funds to support accelerated learning programs as part of a CTE program of study?	C	<u>Perkins Sec. 124(b)(23)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
24. Does the provider use leadership funds to support career academies to implement a postsecondary education and workforce-ready curriculum at the secondary education level through CTE programs and programs of study that address the needs described in the CLNA under Section 134(c)?	C	<u>Perkins Sec. 124(b)(24)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
25. Does the provider use leadership funds for any other state leadership activities to improve the quality of CTE?	C	<u>Perkins Sec. 124(b)(25)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
26. Does the provider use leadership funds for administrative costs?	C	<u>Perkins Sec. 124(c)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	



## Objective 1.e: Student Organizations

*The grant recipient has used funds for a Career and Technical Student Organization (CTSO).*

### **(C/E) Indicator 1.e: CTE Student Organizations**

**Citation:** Perkins V. Section 124

#### **Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 1.e Student Organizations
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### **Questions for Review and Discussion**

1. How does the grant support the CTSO?
2. Has the grant recipient submitted the correct and timely invoice to the Department?
3. Has the Department rejected any deliverables?
4. Has the grant manager had any issues with the grant recipient?
5. Has the Department approved all amendments?
6. How do you ensure all purchases with federal funds are reasonable, allocable, allowable and necessary?
7. How do you assure that grant dollars are spent efficiently throughout the year to minimize grant balances at the end of the fiscal year?
8. Explain the procurement procedures for contracting goods or services using grant funds. (if applicable)
9. What are internal controls to guarantee that grants/contracts meet the State of Florida contract services agreement requirements?
10. How does your agency practice economical purchasing?

Core Activity 1-Career and Technical Education  
Objective 1.e – Career and Technical Student Organizations

Question	C / E	Citation(s)	Check Yes, No or NA to answer the question.	Notes
1. Does the provider have policies and procedures to track the flow of federal funds as it applies to the operation of your Career and Technical Student Organization (CTSO)?	C	2 CFR 200.302	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
2. Does the provider have a dedicated grant manager assigned to your particular CTSO grant?	E		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
3. Does the provider offer staff development and training on CTSO program components?	E		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
4. Does the provider offer training to secondary and postsecondary advisors and guidance counselors on CTE requirements?	E		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
5. Does your CTSO registration/application form include a section for students who wish to self-declare a disability?	C	Florida Perkins V State Plan Section 1004.91(3), F.S.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Question	C / E	Citation(s)	Check Yes, No or NA to answer the question.	Notes
6. Does your CTSO have a dedicated advisory council/committee?	C	Perkins V Sec. 124	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
7. Do you have purchasing policies and procedures that include standard accounting practices, budgeting and documenting and reporting procedures? Attach a copy of your purchasing policies and procedures, or include the website location.	C	2 CFR 200.302	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
8. Does your agency have a fiscal grant manager assigned to this federal grant project?	E		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
9. Do you maintain records as the regulations outlined?	C	FDOE Green Book, Sec. C Retention and Access to Records	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
10. Do you have any contractual agreements? If yes, provide a list if not previously submitted.	C	2 CFR 200.318	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Question	C / E	Citation(s)	Check Yes, No or NA to answer the question.	Notes
11. Does your agency have agreements in place to maximize purchasing potential?	C	2 CFR 200.318	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
12. Were any personnel costs (salary, benefits) charged to this grant?	C	2 CFR 200.430	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
13. Was a semi-annual certification completed for all of these employees?	C	FDOE Green Book, Sec. C Personnel Cost – Time Distribution	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
14. Provide sample time and effort reports (semi-annual certification).	C	FDOE Green Book, Sec. C Personnel Cost – Time Distribution	Request made by Team Leader	

# CORE ACTIVITY 2 ADULT EDUCATION



**Adult Education, distinct from child education, is a practice in which adults engage in systematic and sustained self-educating activities in order to gain new forms of knowledge, skills, attitudes or value.**

The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014 (Public Law No. 113-128) and replaces its predecessor, the Workforce Investment Act (WIA) of 1998. WIOA provides direction, guidance and essential updates for the workforce system in every state. The new law prioritizes a market-driven approach to talent development to prepare individuals seeking employment for today's and future jobs. Added emphasis is placed on the need for access to workforce services for all individuals. Regional alignment of markets and resources is facilitated and encouraged. The [State of Florida WIOA Unified Plan](#) for the period July 1, 2020 through June 30, 2024 includes the following required programs:

- Adult Program
- Dislocated Worker Program
- Youth Program
- Adult Education and Family Literacy Act (AEFLA)
- Wagner-Peyser Act
- Vocational Rehabilitation Program, including Blind Services Program

WIOA and Florida's WIOA Unified Plan are a call to action to fulfill Florida's strategic vision for WIOA implementation, which will be realized by accomplishing these three goals:

- Enhance alignment and market responsiveness of workforce, education, and economic development systems through improved service integration that provides businesses with skilled, productive, and competitive talent and Floridians with employment, education, training, and support services that reduce welfare dependence and increase opportunities for self-sufficiency, high-skill and high-wage careers, and lifelong learning.
- Promote accountable, transparent, and data-driven workforce investment through performance measures, monitoring and evaluation that informs strategies, drives operational excellence, leads to identifying and replicating best practices, and empowers an effective and efficient workforce delivery

system.

- Improve career exploration, educational attainment, and skills training for in-demand industries and occupations for Florida youth that lead to enhanced employment, career development, credentialing, and post-secondary education opportunities.

Florida’s adult education program is a key partner in this endeavor to increase access to employment, education, training, and support services for individuals, particularly those with barriers to employment and the services they need to succeed in the labor market.

The AEFLA program presents an extraordinary opportunity to improve the quality of life for individuals with low skills. Services provided under AEFLA are intended to lead to further education, training opportunities, and work. The program seeks to increase adults' educational and workforce development opportunities as workers, parents, and citizens. While playing a critical role in adult attainment of a secondary school diploma, the program also aims to assist in the transition to postsecondary education and training through career pathways.

The vision of Florida’s adult education system is to hold learners at the center and deliver outcomes that promote full participation in the workforce, resulting in high-quality credentials of value and close equity and achievement gaps. The following strategic priorities now guide the work of transforming Florida’s adult education system:

## INTRODUCTION

The purpose of Core Activity 2 is to assist the reviewer in the evaluation of the grant recipient’s AE programs. Core Activity 2 is dissected into three objectives to help the reviewer determine the grant's operations' compliance and effectiveness. Because each grant type has different programmatic requirements, the reviewer must carefully review each objective and its indicators to determine whether it applies to the grant under review.

Objective 2.a: Performance Accountability System: The grant recipient has an adequate system in place to meet performance expectations.

Objective 2.b: Local Application: The grant recipient has met the minimum requirements for program qualification.



Objective 2.c: Leadership Activities: The grant recipient meets the Department's requirements to provide leadership activities.

Objective 2.d: Integrated English Literacy and Civics Education (IELCE): IELC provides services to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States.

Objective 2 e: Integrated Education and Training (IET) is a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement (Final WIOA regulations at [34 CFR §463.35](#)).

## INSTRUCTIONS

Each indicator in Core Activity 2 is identified as (C) for compliance that must be met or (E) for effectiveness that may not result in a compliance issue but can develop into one if not addressed. Issues identified as effectiveness issues may result in an area of concern and do not have to be formally addressed by the grant recipient in a formal response to the monitoring report. Regulatory citations are referenced in and throughout this activity, as most of these objectives are requirements of the UGG.

- ◆ The reviewer looks at each of the objectives and indicators to determine if applicable to the grant/program under review.
- ◆ If a further review of any of these systems is necessary based on the reviewer's findings, obtain copies of all documents relevant to the reviewer's conclusions to share with management as appropriate.
- ◆ If a compliance indicator is not met, it will result in a finding due to a violation (condition) of a specific compliance requirement in law, regulations, UGG, national policies, Grant Terms and Conditions, federal policy guidance, and the grant agreement. Negative responses to an indicator will lead to a determination of noncompliance. Collect evidence as adequate documents must support written findings and be contained in the review file.



## Objective 2.a: Performance Accountability System

*The grant recipient has an adequate system in place to meet the performance expectations.*

### (C/E) Indicator 2.a: Performance Accountability System

**Citation:** 34 CFR 462.40, 34 CFR 462.41, 34 CFR 99.31, 34 CFR 104.38, Rule 6A-014, Rule 6A-042, Florida Adult Education Assessment Policy

#### Instructions:

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 2.a Performance Accountability System
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### Questions for Review and Discussion

1. How are student gains measured in your program? How are state-approved assessment scores documented and utilized to inform instruction?
2. How do you ensure the security of written examination materials?
3. What is the role of the AE director in the verification of data?
4. Who has the responsibility of correcting missing and erroneous data reported to you by the state?
5. What type of staff development or training is provided to the staff responsible for data collection and reporting?
6. How does your program follow up with students after they exit the Adult Ed program?
7. Describe the instructor and staff development provided to adhere to NRS requirements.

Core Activity 2 –Adult Education  
Objective 2.a: Performance Accountability System

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
Section 2 – Adult Education Assessment				
Provider intake and placement process for new students				
1. What is the providers policy for applying the N.R.S. Test Benchmarks for Educational Functional Levels (EFLs), when placing students into programs and reporting student gains?	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 462.40</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Copy of policy used to apply EFLs</li> <li>• AE Assessment Policy</li> </ul>	
2. Does the eligible provider inform potential students, in writing, that their personal and confidential information: <ul style="list-style-type: none"> <li>○ Will be shared among the WIOA core program partner staff and subcontractors;</li> <li>○ Will be used only for the purpose of conducting an employment data match and that further disclosure of personal confidential information or records is prohibited; and,</li> <li>○ Will not be shared among WIOA core partners if the individual declines to share personal confidential information or records and that declining to share will not impact eligibility for services?</li> </ul>	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 99.31</a></li> </ul>	<ul style="list-style-type: none"> <li>• Copy of the participant signed release of information</li> </ul>	
3. Are students being placed within a program of instruction based on the lowest score obtained	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 462.41</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Local assessment policy and procedures</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
by the student in the respective skill area of the standardized assessment?				
4. Does the provider use an approved test as required to pre-and post-test Adult Basic Education (A.B.E.) students?	C	<ul style="list-style-type: none"> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">34CFR 462.41</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Sample test results reflecting test name/form/level</li> </ul>	
5. Does the provider 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?	C	<ul style="list-style-type: none"> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">34CFR 462.41</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Copy of procedure</li> </ul>	
6. Does the provider use a standardized assessment instrument(s) to pre-and post-test Adult English for Speakers of Other Languages (ESOL) or Integrated English Literacy and Civics Education (IELCE) students enrolled in the English Literacy for Career and Technical Education (ELCATE) course?	C	<ul style="list-style-type: none"> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">34CFR 462.41</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Sample test results reflecting test name/form/level</li> </ul>	
7. Does the provider have an alternative assessment instrument for diagnostic purposes for a student with disabilities if the standard assessment instruments do not accurately measure the student's ability?	C	<ul style="list-style-type: none"> <li>• <a href="#">34 C.F.R. Part 104.38</a></li> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Sample test results from the diagnostic instrument</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
8. Does your program follow the test administration guidelines in each Test Administration Manual furnished by the assessment's publisher?	C	<ul style="list-style-type: none"> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">34 CFR 462.41</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Local test policy and procedures manual</li> <li>• Observation of testing procedure</li> <li>• Test publishers testing guidelines</li> </ul>	
9. Are your testing administrators certified? (CASAS, TABE, TABE CLAS-E, BEST Literacy, BEST Plus)	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 462.41</a></li> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Copies of testing administrators certificates</li> </ul>	
10. Does the provider have a procedure that provides for determining when a student has completed the required hours of instruction before administering a post-test?	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 462.41</a></li> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Copy of procedure</li> </ul>	
11. Does the provider require that any exception to administering a post-test to a student before completing the required number of hours of instruction be approved by the program administrator?	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 462.41</a></li> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Exception policy and procedure</li> <li>• Sample of a granted exception submitted and approved by the provider if applicable</li> </ul>	
12. Are tests of the same skill area used for pre-and post-testing students? (reading or listening pre-test to reading or listening post-test, math pre-test to math post-test etc.)?	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 462.41</a></li> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Example of pre-and post-test records for a student</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
13. Are post-tests given with an alternate form, or at a higher or lower level, per the publisher's test administration manual?	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 462.41</a></li> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Example of pre- and post-test records for a student</li> </ul>	
<p style="background-color: #cccccc; margin: 0; padding: 2px;"><b>Accommodations</b></p> <p>14. 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?</p>	C	<ul style="list-style-type: none"> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> <li>• <a href="#">34 CFR 104.38</a></li> </ul>	<ul style="list-style-type: none"> <li>• Copy of procedure</li> </ul>	
15. What documentation is acceptable for submittal for students to request accommodations?	C	<ul style="list-style-type: none"> <li>• <a href="#">Rule 6A-6.014 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Sample of required documentation</li> </ul>	
<p style="background-color: #cccccc; margin: 0; padding: 2px;"><b>Test Materials and Security</b></p> <p>16. Have there been any compromises with test security including discrepancies noted in the number or serial number of testing materials or tests determined to be missing?</p>	C	<ul style="list-style-type: none"> <li>• <a href="#">Rule 6A-10.042 F.A.C.</a></li> <li>• <a href="#">Florida Adult Education Assessment Policy</a></li> </ul>	<ul style="list-style-type: none"> <li>• Report filed with the Florida Department of Education</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
17. Has the provider been responsible for the secure destruction of certain test materials?	C	<ul style="list-style-type: none"> <li>• <u>Rule 6A-10.042 F.A.C.</u></li> <li>• <u>Florida Adult Education Assessment Policy</u></li> </ul>	<ul style="list-style-type: none"> <li>• Copy of the document certifying the destruction</li> </ul>	
18. If test materials are distributed, is written documentation kept by test administrators and proctors for each point at which test materials are distributed and returned?	C	<ul style="list-style-type: none"> <li>• <u>Rule 6A-10.042 F.A.C.</u></li> <li>• <u>Florida Adult Education Assessment Policy</u></li> </ul>	<ul style="list-style-type: none"> <li>• Test distribution log</li> </ul>	



## Objective 2.b: Local Application

*The grant recipient has met the minimum requirements for program qualification.*

### **(C/E) Indicator 2.b: Local Application**

**Citation:** WIOA Section 203, 231, 225

#### **Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective2.b Local Application
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### **Questions for Review and Discussion**

1. Does the provider meet the Florida Minimum Instructional Service Standards and requirements under the AEFLA?
2. Does the provider verify the eligibility of first-time students enrolling in the AE programs?
3. Does the provider engage in a memorandum of understanding (MOU) identified by the regional needs and the local plan?
4. Does the provider have the ability to serve eligible individuals with disabilities, including eligible individuals with learning disabilities?
5. Does the provider have minimum qualifications for the teachers/instructors, counselors, and administrators delivering the program activities?
6. Does the provider provide services under this section to carry out a program for criminal offenders in a correctional institution?
7. Do the program activities incorporate instruction and activities such as workplace preparation and technology to enhance skills needed to enter the workforce and transition to postsecondary education?



Core Activity 2-Adult Education  
Objective 2.b: Local Application

Question	C/E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<b>Section 2B – Local Provisions</b>				
1. Does the provider verify the eligibility of first-time students enrolling in adult education programs?	C	<ul style="list-style-type: none"> <li>• WIOA section 203(4)</li> </ul>	<ul style="list-style-type: none"> <li>• Policy and procedures for enrolling first-time students</li> </ul>	
2. Does the provider engage in a memorandum of understanding (MOU) identified by the regional needs and in the local plan?	C	<ul style="list-style-type: none"> <li>• WIOA section 231(e)</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a copy of the MOU with the LWDB and all other applicable MOUs</li> </ul>	
3. Does the provider have the ability to serve eligible individuals with disabilities, including qualified individuals with learning disabilities?	C	<ul style="list-style-type: none"> <li>• WIOA section 231(e)</li> </ul>	<ul style="list-style-type: none"> <li>• Provide an example of accommodation provided and an Adult Individual Education Plan (AIEP) or 504 plan</li> </ul>	
4. Does the provider have minimum qualifications for the teachers/instructors, counselors, and administrators delivering the program activities?	C	<ul style="list-style-type: none"> <li>• WIOA section 231(e)</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a copy of the position descriptions</li> </ul>	
5. Do the program activities incorporate instruction and activities such as workplace preparation and technology to enhance skills needed to enter the workforce and transition to postsecondary education?	C	<ul style="list-style-type: none"> <li>• WIOA section 231(e)</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a copy of a lesson plan or curriculum used</li> </ul>	
6. Does the provider provide services under this section to carry out a program for criminal offenders in a correctional institution?	C	<ul style="list-style-type: none"> <li>• WIOA section 225(c)</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a list of services or schedule of classes within the correctional institution</li> </ul>	



**Objective 2.c:  
Leadership  
Activities**

*The grant recipient meets the requirements set by the Department to provide leadership activities.*

**(C/E) Indicator 2.c: Leadership Activities**

**Citation:** WIOA Section 223

**Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 2.a Performance Accountability System
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

**Questions for Review and Discussion**

1. Does the grant recipient use funds to develop or enhance the adult education system?
2. Does the grant recipient align adult education and literacy activities with eligible one-stop partners and core programs?
3. Are professional development programs offered to improve the instruction provided?
4. Does the grant recipient provide technical assistance to providers of adult education and literacy activities?
5. Does the grant recipient develop and disseminate instructional and programmatic practices based on the most rigorous or scientifically valid research available in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training?
6. Does the grant recipient act in the role of a one-stop partner to provide access to employment, education, and training services?

Core Activity 2- Adult Education  
Objective 2.c – State Leadership Activities

Question	Citation(s)	C / E	Notes	
Check Yes or No to answer the question.				
<p>1. Does the provider use 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?</p> <ul style="list-style-type: none"> <li>• Did the coordination include developing career pathways to provide access to employment and training services for individuals in adult education and literacy activities?</li> </ul>	C	<u>WIOA Sec. 223(a)(1)(A)</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>2. Does the provider use leadership funds to establish or operate high-quality professional development programs to improve the instruction provided for:</p> <ol style="list-style-type: none"> <li>a. instruction incorporating the essential components of reading instruction;</li> <li>b. instruction related to the specific needs of adult learners;</li> <li>c. instruction provided by volunteers;</li> <li>d. instruction provided by state or local personnel; or</li> <li>e. dissemination of information about models and promising practices?</li> </ol>	C	<u>WIOA Sec. 223(a)(1)(B)</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>3. Does the provider use leadership funds to provide technical assistance to eligible providers of adult education and literacy activities in the following areas:</p> <ol style="list-style-type: none"> <li>a. reading;</li> <li>b. writing;</li> <li>c. speaking;</li> </ol> <p>mathematics;</p> <ol style="list-style-type: none"> <li>d. English language acquisition programs;</li> <li>e. distance education; and</li> <li>f. staff training?</li> </ol>	C	<u>WIOA Sec. 223(a)(1)(C)(i)</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<p>4. Does the provider use leadership funds to provide access to employment,</p>	C	<u>WIOA Sec. 223(a)(1)(C)(ii)</u>	<input type="checkbox"/> Yes	

Question	C / E	Citation(s) Check Yes or No to answer the question.	Notes	
education, and training services as a one-stop partner?			<input type="checkbox"/> No	
5. Does the provider use leadership funds to offer assistance in the use of technology to improve system efficiencies?	C	<u>WIOA Sec. 223(a)(1)(C)(iii)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
6. Does the provider use leadership funds to support monitoring and evaluating activities and disseminating information about models and proven or promising practices within the state?	C	<u>WIOA Sec. 223(a)(1)(D)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
7. Does the provider use leadership funds to support literary resource centers within your region?	C	<u>WIOA Sec. 2223(a)(2)(A)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
8. Does the provider use leadership funds to develop and implement: a. technology applications; b. translation technology; or c. distance education, including professional development?	C	<u>WIOA Sec. 223(a)(2)(B)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
9. Does the provider use leadership funds to develop and disseminate curricula including: a. phonemic awareness; b. systematic phonics; c. fluency; and d. reading comprehension?	C	<u>WIOA Sec. 223(a)(2)(C)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
10. Does the provider use leadership funds to develop content and models for integrated education, training, and career pathways?	C	<u>WIOA Sec. 223(a)(2)(D)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
11. Does the provider use leadership funds to develop and implement programs that	C	<u>WIOA Sec. 223(a)(2)(E)</u>	<input type="checkbox"/> Yes	

Question		Citation(s) Check Yes or No to answer the question.	C / E Notes	
achieve the statewide objectives and measure the progress of those programs?			<input type="checkbox"/> No	
12. Does the provider use leadership funds to develop and implement a system to assist in transitioning from adult education and family literacy to postsecondary education?	C	<u>WIOA Sec. 223(a)(2)(F)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
<b>13. Does the provider use leadership funds to promote the integration of literacy instruction and occupational skills training and promoting these linkages with employers?</b>	C	<u>WIOA Sec. 223(a)(2)(G)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
<b>14. Does the provider use leadership funds to promote workplace adult education and literacy activities?</b>	C	<u>WIOA Sec. 223(a)(2)(H)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
<b>15. Does the provider use leadership funds to identify curriculum frameworks aligned with the following:</b> 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 Sec. 116; d. standards and academic requirements for enrollment in non-remedial, for-credit courses in postsecondary educational institutions or institutions of higher education supported by the state or outlying area; and e. the content of occupational and industry standards widely used by business and industry in the state or outlying area?	C	<u>WIOA Sec. 223(a)(2)(I)(ii)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
16. Does the provider use leadership funds to develop and pilot strategies for improving teacher quality and retention?	C	<u>WIOA Sec. 223(a)(2)(J)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	

Question	C / E	Citation(s) Check Yes or No to answer the question.	Notes	
17. Does the provider use leadership funds to develop and implement programs and services to meet the needs of adult learners with learning disabilities or English language learners?	C	<u>WIOA Sec. 223(a)(2)(K)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
18. Does the provider use leadership funds to provide outreach to instructors, students, and employers?	C	<u>WIOA Sec. 223(a)(2)(L)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
19. Does the provider use leadership funds on any other state-approved activities of statewide significance that promote the purpose of adult education leadership activities?	C	<u>WIOA Sec. 223(a)(2)(M)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
20. Does the provider use leadership funds to collaborate with local agencies to avoid duplicative efforts and maximize the impact of adult education leadership activities?	C	<u>WIOA Sec. 223(b)</u>	<input type="checkbox"/> Yes  <input type="checkbox"/> No	



**Objective 2.d:**  
Integrated English  
Literacy and Civics  
Education (IELCE)

IELCE provides education services to English language learners who are adults, including professionals with degrees and credentials in their native countries that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States.

**(C/E) Indicator 2.d:** Integrated English Literacy and Civics Education (IELCE)

**Citation:** WIOA Section 243 and 34 CFR 463.33, 34 CFR 463.74, 34 CFR 463.73, 34 CFR 463.37

**Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Evidence submitted for objective
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

**Questions for Review and Discussion**

***The IELCE program must provide education services to English language learners who are adults, including professionals with degrees and credentials in their native countries.***

1. Describe the eligible individuals to be served in this IELCE program.
2. Are professionals with degrees and credentials in their native countries included in the target population? Why (not)?
3. What demographic or other data was used to determine the target population for this IELCE program?

***The IELCE program must include instruction in IELCE and must include instruction in literacy and English language acquisition as described under 34 CFR 463.33. The IELCE program must include instruction on the rights and responsibilities of citizenship and civic participation as described under 34 CFR 463.33.***

1. Describe the literacy and English language instruction.
2. How is it aligned with the State's content standards for adult education?
3. Describe the rights and responsibilities of citizenship and civic participation instruction-how is it offered in the IELCE program?

Core Activity 2-Adult Education  
Objective 2.d: Integrated English Literacy and Civics Education (IELCE)

Question	C/E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>1. Do your IELCE services and program include the following English language acquisition as well as civics education requirements?</p> <ul style="list-style-type: none"> <li>• Instruction in IELCE and instruction in literacy and English language acquisition as described in 463.33</li> <li>• Instructions on the rights and responsibilities of citizenship and civic participation as described in 463.33</li> </ul>	C	<ul style="list-style-type: none"> <li>• <a href="#">34 CFR 463.33</a></li> </ul>	<ul style="list-style-type: none"> <li>• Master schedule of courses/programs and the corresponding unduplicated student enrollment</li> </ul>	
<p>2. As an eligible IELCE provider, are your integrated English literacy and civics education activities combined with integrated education and training activities in one or both of the following ways?</p> <ul style="list-style-type: none"> <li>○ Co-enrolling participants in an IET program (described in subpart D) provided within the local/regional workforce development area from funding sources other than Section 243</li> </ul> <p style="text-align: center;">AND/OR</p> <p>Using Section 243 funds to support IET activities described in subpart D</p>	C	<ul style="list-style-type: none"> <li>• 34 CFR 463.74</li> </ul>	<ul style="list-style-type: none"> <li>• Policy and Procedures</li> </ul>	
Question	C/E	Citation(s)	Methods of Collection/	Notes



			<b>Examples of Documentary Evidence</b>	
<ul style="list-style-type: none"> <li>3 Does the provider demonstrate that activities supported by IELCE funds are attributable to IELCE only?</li> </ul>	C	<ul style="list-style-type: none"> <li><a href="#">WIOA section 243</a></li> </ul>	<ul style="list-style-type: none"> <li>Time and Effort records</li> </ul>	
<p>4. As an eligible provider receiving funding through the IELCE program, are your services designed to provide access to the following requirement? Prepare for and place adult English language learners in unsubsidized employment within in-demand industries and occupations, leading to economic self-sufficiency.</p>	C	<ul style="list-style-type: none"> <li><a href="#">34 CFR 463.73</a></li> </ul>	<ul style="list-style-type: none"> <li>MOU with a local workforce industry board</li> </ul>	
<p>3. Does your program meet the requirement that the adult education and literacy activities, workforce preparation activities, and workforce training be integrated? Services must be provided concurrently and contextually such that</p> <p>(a) Within the overall scope of a particular integrated education and training program, the adult education and literacy activities, workforce preparation activities, and workforce training:</p> <p>(1) Are each of sufficient intensity and quality, and based on the most rigorous research available, particularly with respect to improving reading, writing, mathematics, and English proficiency of eligible individuals;</p> <p>(2) Occur simultaneously; and</p> <p>(3) Use occupationally relevant instructional materials.(b) The integrated education and training program has a single set of learning objectives that identifies specific adult education content, workforce preparation activities, and workforce training</p>	C	<ul style="list-style-type: none"> <li><a href="#">34 CFR 463.37</a></li> </ul>	<ul style="list-style-type: none"> <li>Sample of the integrated learning plan</li> <li>Sample student assignment</li> </ul>	

competencies, and the program activities are organized to function cooperatively.				
---	--	--	--	--



## Objective 2.e: Integrated Education and Training (IET)

IET is a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement (Final WIOA regulations at [34 CFR §463.35](#)).

### (C/E) Indicator 2.e: Integrated Education and Training (IET)

**Citation** WIOA Section 134(c)(3)(D) and 34 CFR 463.35, 34 CFR 463.30, 34 CFR 463.31, 34 CFR 46.34, Florida Integrated Education and Training Guide

#### Instructions:

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Evidence submitted for objective
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### Questions for Review and Discussion

***The IET program must provide integrated education and training services to adult learners, including professionals with degrees and credentials in their native countries.***

4. Describe the eligible individuals to be served in this IET program.
5. Are professionals with degrees and credentials in their native countries included in the target population? Why (not)?
6. What demographic or other data was used to determine the target population for this IET program?
7. Is the IET program offered by an institution of higher education; another type of organization, such as a nonprofit education and training provider?
8. Is the IET program offered by two or more organizations working in partnership, so long as the program equips individuals to attain basic skills and training in a specific occupation or industry?

***IELCE in Combination with IET – 34 CFR 463.74 specifies that an eligible provider that receives funds through the IELCE program may meet the requirement to use funds for integrated English literacy and civics education in combination with integrated education and training activities by:***

- a. Co-enrolling participants in integrated education and training as described in subpart D that is provided within the local or regional workforce development area from sources other than section 243; OR***
- b. Using funds provided under section 243 to support integrated education and training activities as cited in subpart D.***

1. How is IELCE delivered **in combination with** the IET activities for participants?
2. If participants are co-enrolled in an IET program provided from sources other than WIOA Section 243 funding, describe how IELCE participants access and participate in the IET program.
3. If the IET program is provided using WIOA Section 243 funds, describe how IELCE participants access and participate in the IET program.

***Eligible providers receiving funds through the IELCE program must provide services that are designed to:***

- a) Prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency; AND***
- b) Integrate with the local workforce development system and its functions to carry out the activities of the program.***

1. What is the strategy or design for preparing IET participants for, and placing them in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency?
2. How does this IELCE program integrate with the local workforce development system to carry out the activities of the program?

Core Activity 2-Adult Education  
Objective 2.e: Integrated Education and Training (IET)

Question	C/ E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	N o t e s
<p>1. How does your Integrated Education and Training (IET) program integrate the following three components concurrently and contextually:</p> <ul style="list-style-type: none"> <li>• Adult education and literacy standards</li> <li>• Workforce preparation skills</li> <li>• Workforce training activities</li> </ul>	C	<p><a href="#">34 CFR 463.35</a></p> <p><a href="#">34CFR 463.30</a></p> <p><a href="#">34CFR 463.31(b)</a></p> <p><a href="#">34 CFR 463.34</a></p> <p><a href="#">WIOA 134(c)(3)(D)</a></p>	<ul style="list-style-type: none"> <li>• Provide a copy of the IET Program of Study.</li> <li>• Confirm Adult Education and Literacy standards from Adult Education Curriculum frameworks</li> <li>• Confirm Workforce Preparation activities from Employability frameworks.</li> <li>• Confirm Workforce training activities from IET Program of Study.</li> <li>• Provide a copy of the Single Set of Learning Objectives (SSLO) as a part of the IET Program of Study or a separate SSLO document.</li> </ul>	
<p>2. Describe the instructional model used for your IET program.</p> <ul style="list-style-type: none"> <li>• Fully integrated</li> <li>• Partially integrated</li> <li>• One instructor</li> <li>• Employer/community partner</li> </ul>	C	<p><a href="#">Florida's Integrated Education and Training Guide</a></p>	<ul style="list-style-type: none"> <li>• IET program schedule</li> <li>• Fully integrated or one instructor (1 block)</li> <li>• Partially integrated (separate time blocks)</li> <li>• Employer/comm unity partner</li> </ul>	

			(varies)	
<p>3. As an eligible IELCE provider, how are you integrating English literacy and civics education activities with integrated education and training activities in one or both of the following ways?</p> <ul style="list-style-type: none"> <li>• Co-enrolling participants in an IET program (described in subpart D) provided within the local/regional workforce development area from funding sources other than Section 243</li> <li>• AND/OR</li> <li>• Using Section 243 funds to support IET activities described in subpart D</li> </ul>	C	34 CFR 463.74	<ul style="list-style-type: none"> <li>• Provide IET Program of Study for IELCE</li> <li>• Confirm English Language Proficiency standards in the Adult Education and Literacy standards (step 2) section of the IET Program of Study</li> <li>• Provide documentation by submitting a sample of training material used</li> </ul>	
<p>4. How is your program working to market and recruit students to participate in your IET program?</p>	C	<a href="#">Florida's Integrated Education and Training Guide</a>	<ul style="list-style-type: none"> <li>• Marketing materials (flyers, schedules, etc.)</li> <li>• Student enrollment numbers</li> </ul>	
<p>*Note-The indicators are labeled (C) for compliance that must be met or (E) for effectiveness that may result in an area of concern or a finding at a later time if not addressed. If a compliance indicator is not met, it results in a finding.</p>				

# CORE ACTIVITY 3

## FINANCIAL MANAGEMENT



**Assess the grant recipient's financial management systems and operations to administer the grant/project to promote transparency and accountability and comply with the requirements outlined in the award.**

---

### INTRODUCTION

The purpose of Core Activity 3 is to assess the financial management systems and functions employed by the grant recipient to administer the grant/project in a manner that promotes accountability and transparency and is in compliance with the requirements outlined in the award.

Objective 3.a: Standards for Financial and Program Management: Effective control, integrity, and accountability are maintained to achieve the grant's objectives in operational effectiveness and efficiency, reliable financial reporting, and compliance with laws, regulations, and policies.

Objective 3.b: Contracts and Procurement: An accounting system is in place that allows the grant recipient to maintain accurate, current, and complete disclosure of the grant's financial results and those of its subrecipients.

Objective 3.c: Equipment: The grant recipient has a system of controls and documentation for the stewardship of equipment purchased with grant funds.

Objective 3.d: Allowable Cost: The grant recipient has controls and documentation in place to account for all grant-funded activities.

Objective 3.e: COVID-19: Implementations and guidance during the pandemic.

### INSTRUCTIONS

Each indicator in Core Activity 3 is identified as (C) for compliance that must be met or (E) for effectiveness that may not result in a compliance issue but can develop into one if not addressed. Issues identified as effectiveness issues may result in an area of concern and do not have to be formally addressed by the grant recipient in a formal response to the

monitoring report. Regulatory citations are referenced in and throughout this activity, as most of these objectives are requirements of the UGG.

- ◆ Focus specifically on management systems related to internal controls, financial reporting, payment and cash management, program income, allowable costs/cost classification, cost allocation, and indirect costs.
- ◆ If a further review of any of these systems is necessary based on the reviewer's findings, obtain copies of all documents relevant to the reviewer's conclusions to share with management as appropriate.
- ◆ If a compliance indicator is not met, it will result in a finding due to a violation (condition) of a specific compliance requirement in law, regulations, UGG, national policies, Grant Terms and Conditions, federal policy guidance, and the grant agreement. Negative responses to an indicator will lead to a determination of noncompliance. Ensure to collect evidence as adequate documents must support written findings and be contained in the review file.





**Objective 3.a:**  
Standards for  
Financial and Program  
Management

*Effective control, integrity, and accountability are maintained for achievement of the grant's objectives in operational effectiveness and efficiency, reliable financial reporting, and compliance with laws, regulations, and policies.*

**(C) Indicator 3.a: Standards for Financial and Program Management**

**Citation:** 2 CFR 200.302, 200.303, 200.430, 200.475, FDOE Green Book C-19, Section 112.061, F.S.

**Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 3.a Statutory and National Policy Requirements
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

**Questions for Review and Discussion**

1. Does the provider have a dedicated financial management system?
2. Does the provider have fiscal policies and procedures?
3. How does the provider monitor grant expenditures?
4. Who is responsible for approving grant expenditures?
5. Does the provider maintain time and effort reports for staff paid by Perkins funds?
6. Does the provider have policies and procedures on grant-funded travel?
7. Does the provider use Perkins grant-funded purchasing cards?

Core Activity 3-Financial Management  
Objective 3.a – Standards for Financial and Program Management

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the provider have a dedicated financial management system?	C	2 CFR 200.302(b)	Name of financial management system	
2. Does the provider have fiscal policies and procedures that include: a. Standard accounting practices b. Budgeting c. Documentation and Reporting d. Cash management	C	2 CFR 200.302 2 CFR 200.303	<ul style="list-style-type: none"> <li>• Financial management policies and procedures</li> </ul>	
3. Does the provider maintain time and effort reports for staff paid by Perkins funds?	C	2 CFR 200.430 FDOE Green Book, C-19	<ul style="list-style-type: none"> <li>• Employee time and effort reports</li> </ul>	
4. Does the provider have policies and procedures on grant-funded travel?	C	Section 112.061, F.S. 2 CFR 200.475	<ul style="list-style-type: none"> <li>• Policy and procedures and</li> <li>• Sample of grant-funded travel records</li> </ul>	
5. Does the provider use Perkins grant-funded purchasing cards?	E		<ul style="list-style-type: none"> <li>• List of personnel with grant-funded purchasing cards</li> <li>• Sample of purchasing card transactions and reconciliations</li> </ul>	



### **Objective 3.b: Contracts and Procurement**

*An accounting system is in place that allows the grant recipient to maintain accurate and completed disclosure of the grant's financial results and those of its sub recipients.*

#### **(C) Indicator 3.b: Contracts and Procurement**

**Citation:** 2CFR 200.318, 200.334, 200.321, 200.327, FDOE Green Book

#### **Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 3.b Contracts and Procurement
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### **Questions for Review and Discussion**

1. Does the provider have dedicated policies and procedures for purchasing equipment and the contracting of goods and services?
2. Does the provider maintain financial records in accordance with federal, state, and local records retention policies?
3. Does the provider have written standards of conduct covering conflicts of interest and governing its employees' acts in selecting, awarding, and administering contracts?
4. Does the provider have a dedicated contract management system to track deliverables, invoices, payments, etc.?
5. Does the provider have internal controls to ensure economic purchasing and to maximize purchasing potential?
6. Does the provider ensure that contracts funded with federal money include the required contract provisions?

Core Activity 3-Financial Management  
Objective 3.b – Contracts and Procurement

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the provider have dedicated policies and procedures for purchasing equipment and contracting goods and services?	C	2 CFR 200.318	<ul style="list-style-type: none"> <li>• Policies and procedures manual</li> </ul>	
2. Does the provider maintain financial records in accordance with federal, state and local records retention policies?	C	2 CFR 200.334 FDOE Green Book	<ul style="list-style-type: none"> <li>• Records retention policy</li> <li>• Procurement records (to be determined by the FDOE monitoring team lead)</li> </ul>	
3. Does the provider have written standards of conduct covering conflicts of interest and governing the acts of its employees in the selection, award and administration of contracts?	C	2 CFR 200.318(C)(1)	<ul style="list-style-type: none"> <li>• Conflict of interest form</li> </ul>	
4. Does the provider have a dedicated contract manager position?	E		<ul style="list-style-type: none"> <li>• If applicable, job description</li> </ul>	
5. Does the provider have a dedicated contract management system to track deliverables, invoices, payments, etc.?	C	2 CFR 200.318	<ul style="list-style-type: none"> <li>• Policies and procedures manual</li> </ul>	
6. Has the provider used minority-owned businesses, women-owned businesses and labor surplus firms are used when possible?	C	2 CFR 200.321	<ul style="list-style-type: none"> <li>• Copy of applicable contract(s)</li> </ul> <p style="text-align: center;">And Procurement policy</p>	
7. Does the provider have internal controls to ensure economical purchasing and to maximize purchasing potential?	C	2 CFR 200.318	<ul style="list-style-type: none"> <li>• Internal controls policies on procurement/purchasing</li> </ul>	
8. Does the provider ensure that contracts funded with federal money include the required contract provisions?	C	2 CFR 200.327	<ul style="list-style-type: none"> <li>• Copy of applicable contract(s)</li> </ul>	



### Objective 3.c: Equipment

*The grant recipient has a system of controls and documentation for the stewardship of equipment purchased with grant funds.*

#### (C) Indicator 3.c: Equipment

**Citation:** 2 CFR 200.313

#### **Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 3.c Equipment
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### **Questions for Review and Discussion**

1. Does the provider have policies and procedures for the purchase, protection, use, and disposal of equipment purchased with federal grant funds?
2. Does the provider have a dedicated inventory management system?
3. Have there been any reports of loss, damage, or theft of grant-funded equipment in the last 24 months?
4. Does the provider have dedicated personnel responsible for property and inventory management?

Core Activity 3-Financial Management  
Objective 3.c – Equipment

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>1. Does the provider have policies and procedures for the purchase, protection, use and disposal of equipment purchased with federal grant funds that include:</p> <ol style="list-style-type: none"> <li>a. A control system developed to ensure adequate safeguards to prevent loss, damage, or theft of the <u>property</u>.</li> <li>b. Adequate maintenance procedures developed to keep the <u>property</u> in good condition.</li> <li>c. Disposition procedures for grant-funded equipment</li> <li>d. Assurances that equipment is used by the provider in the program or project for which it was acquired.</li> </ol>	C	2 CFR 200.313	<ul style="list-style-type: none"> <li>• Fiscal equipment policies and procedures</li> </ul>	
<p>2. Does the provider have a dedicated inventory management system that adheres to the following:</p> <p>Management requirements. Procedures for managing <u>equipment</u> (including replacement equipment), whether acquired in whole or in part under a Federal award, until disposition takes place will, as a minimum, meet the following requirements:</p> <ol style="list-style-type: none"> <li>a. <u>Property</u> records must be maintained that include a description of the <u>property</u>, a serial number or other identification numbers, the source of funding for the <u>property</u> (including the FAIN),</li> </ol>	C	2 CFR 200.313(d)	<ul style="list-style-type: none"> <li>• Equipment and inventory records</li> <li>• Fiscal equipment policies and procedures</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>who holds the title, the acquisition date, and cost of the <u>property</u>, percentage of Federal participation in the <u>project costs</u> for the Federal award under which the <u>property</u> was acquired, the location, use and condition of the <u>property</u>, and any ultimate disposition data including the date of disposal and sale price of the <u>property</u>.</p> <p>b. A physical inventory of the <u>property</u> must be taken and the results reconciled with the <u>property</u> records at least once every two years.</p>				
<p>3. Have there been any reports of loss, damage, or theft of grant-funded equipment in the last 36 months?</p>	C	2 CFR 200.313(d)(3)	<ul style="list-style-type: none"> <li>• Campus incident report, police report, etc.</li> </ul>	
<p>4. Does the provider have dedicated personnel responsible for property and inventory management?</p>	C	2 CFR 200.313(d)	<ul style="list-style-type: none"> <li>• Job description</li> </ul>	



### Objective 3.d:

#### Allowable Cost

*The grant recipient has controls and documentation in place to account for all grant-funded activities.*

#### ( C )Indicator 3.d: Allowable Cost

**Citation:** 2 CFR 200.421 CFR through 200.476

#### Instructions:

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objective 3.d Allowable Cost
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### Questions for Review and Discussion

1. Does the provider use federal grant funds, advisory councils or committees?
2. Does the provider use federal grant funds for commencement and convocation costs?
3. Does the provider use federal grant funds for compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits)?
4. Does the provider use federal grant funds for conferences, meetings, retreats, seminars, etc.?
5. Does the provider use federal grant funds 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?
6. Does the provider use federal grant funds for recruiting costs?
7. Does the provider use federal grant funds for scholarship and student aid costs?
8. Does the provider use federal grant funds for employee training and development?
9. Does the provider use federal grant funds for transportation costs?
10. Does the provider use federal grant funds for travel costs?



Core Activity 3-Financial Management  
Objective 3.d – Allowable Costs

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the provider use federal grant funds on advertising and/or public relations costs?	C	2 CFR 200.421	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
2. Does the provider use federal grant funds advisory councils or committees?	C	2 CFR 200.422	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
3. Does the provider use federal grant funds to purchase alcoholic beverages?	C	2 CFR 200.423	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
4. Does the provider use federal grant funds on alumni activities?	C	2 CFR 200.424	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
5. Does the provider use federal grant funds on audit costs and related services?	C	2 CFR 200.425	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
6. Does the provider use federal grant funds to cover bad debts, including losses (actual or estimated)?	C	2 CFR 200.426	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
			If applicable, please provide one sample of each year under review.	
7. Does the provider use federal grant funds for bonding costs required by the federal awarding agency as an assurance against financial loss to itself or others?	C	2 CFR 200.427	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
8. Does the provider collect direct or indirect costs for improper payments?	C	2 CFR 200.428	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
9. Does the provider use federal grant funds for commencement and convocation costs?	C	2 CFR 200.429	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
10. Does the provider use federal grant funds for compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits)?	C	2 CFR 200.430 2 CFR 200.431	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
11. Does the provider use federal grant funds for conferences, meetings, retreats, seminars, etc.?	C	2 CFR 200.432	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
12. Does the provider use federal grant funds as contingency provisions for future costs?	C	2 CFR 200.433	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
13. Does the provider use federal grant funds for contributions or donations, including cash, property, services, etc.?	C	2 CFR 200.434	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
14. Does the provider use federal grant funds for the defense and prosecution of criminal and civil proceedings and claims?	C	2 CFR 200.435	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
15. Does the provider use federal grant funds as compensation for the depreciation and/or use of fixed assets?	C	2 CFR 200.436	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
16. Does the provider use federal grant funds for employee health and wellness costs?	C	2 CFR 200.437	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
17. Does the provider use federal grant funds for entertainment costs (amusement, social gatherings, parties, etc.)?	C	2 CFR 200.438	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
18. Does the provider use federal grant funds for acquisition costs of equipment and other 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?	C	2 CFR 200.439	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
19. Does the provider use federal grant funds exchange rates?	C	2 CFR 200.440	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
20. Does the provider use federal grant funds to cover the costs resulting from violations of, or failure of the agency to comply with federal, state, local, or foreign laws and regulations?	C	2 CFR 200.441	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
21. Does the provider use federal grant funds for the costs of fundraising and investment management costs?	C	2 CFR 200.442	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
22. Does the provider use federal grant funds on the gains and losses on disposition of depreciable property and other capital assets?	C	2 CFR 200.443	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
23. Does the provider use federal grant funds for the general costs (salaries and expenses) of government (local, state and Indian Tribes)?	C	2 CFR 200.444	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
			sample of each year under review.	
24. Does the provider use federal grant funds for goods and/or services for personal use?	C	2 CFR 200.445	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
25. Does the provider use federal grant funds for idle facilities (completely unused facilities) and idle capacity (unused capacity of partially used facilities)	C	2 CFR 200.446	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
26. Does the provider use federal grant funds to cover insurance costs?	C	2 CFR 200.447	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
27. Does the provider use federal grant funds for intellectual property costs (patent costs, royalty costs for the use of patents and copyrights, etc.)?	C	2 CFR 200.448	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
28. Does the provider use federal grant funds to pay interest on borrowed capital and/or the financing costs of buildings, construction, land acquisition, etc.?	C	2 CFR 200.449	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
29. Does the provider use federal grant funds for the cost of certain influencing activities ( <b>lobbying</b> ) associated with obtaining grants, contracts, cooperative agreements or loans?	C	2 CFR 200.450	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
30. Does the provider use federal grant funds to cover losses on other awards, services or contracts?	C	2 CFR 200.451	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
31. Does the provider use federal grant funds 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?	C	2 CFR 200.452	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
32. Does the provider use federal grant funds for materials and supplies costs, including the cost of computing devices?	C	2 CFR 200.453	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
33. Does the provider use federal grant funds for memberships, subscriptions and/or professional activity costs?	C	2 CFR 200.454	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
34. Does the provider use federal grant funds for organizational costs that include, but are not	C	2 CFR 200.455	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
limited to, incorporation fees, brokers' fees, fees to promoters, organizers or management consultants, attorneys, accountants, or investment counselors?			If applicable, please provide one sample of each year under review.	
35. Does the provider use federal grant funds for Participant support costs?	C	2 CFR 200.456	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
36. Does the provider use federal grant funds for expenses incurred for security to protect facilities, personnel and work products?	C	2 CFR 200.457	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
37. Does the provider use federal grant funds for pre-award costs and expenditures?	C	2 CFR 200.458	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
38. Does the provider use federal grant funds for professional service costs?	C	2 CFR 200.459	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
39. Does the provider use federal grant funds for proposal costs of potential federal and non-federal awards or projects?	C	2 CFR 200.460	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
			If applicable, please provide one sample of each year under review.	
40. Does the provider use federal grant funds for publications and printing costs?	C	2 CFR 200.461	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
41. Does the provider use federal grant funds for rearrangement and reconversion costs of facilities, or restoration and rehabilitation costs of facilities?	C	2 CFR 200.462	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
42. Does the provider use federal grant funds for recruiting costs?	C	2 CFR 200.463	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
43. Does the provider use federal grant funds for relocation costs of employees?	C	2 CFR 200.464	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
44. Does the provider use federal grant funds for rental costs of real property and equipment?	C	2 CFR 200.465	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	



Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
45. Does the provider use federal grant funds for scholarship and student aid costs?	C	2 CFR 200.466	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
46. Does the provider use federal grant funds for the selling and marketing of services and/or products?	C	2 CFR 200.467	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
47. Does the provider use federal grant funds for specialized service facilities?	C	2 CFR 200.468	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
48. Does the provider use federal grant funds for student activity costs such as intramural activities, student publications, clubs, etc.?	C	2 CFR 200.469	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
49. Does the provider use federal grant funds for taxes that a governmental unit is legally required to pay?	C	2 CFR 200.470	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
50. Does the provider use cost incurred for telecommunications and video surveillance services internet, video surveillance?	C	2 CFR 200.471	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
51. Does the provider use federal grant funds for costs associated with the termination of a federal award?		2 CFR 200.472	<input type="checkbox"/> Yes <input type="checkbox"/> No	
52. Does the provider use federal grant funds for employee training and development?	C	2 CFR 200.473	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
53. Does the provider use federal grant funds for transportation costs?	C	2 CFR 200.474	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
54. Does the provider use federal grant funds for travel costs?	C	2 CFR 200.475	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	
55. Does the provider use federal grant funds for travel and subsistence costs of trustees (or directors)?	C	2 CFR 200.476	<input type="checkbox"/> Yes <input type="checkbox"/> No If applicable, please provide one sample of each year under review.	



### Objective 3.e: COVID-19

*Implementations and guidance during the pandemic.*

#### (C) Indicator 3.e: COVID-19

**Citation:** OMB Memo M-20-202, 2 CFR 200.102

#### Instructions:

- Review the following documents (as applicable):
  - ◆ Waivers
  - ◆ Completed Objective 3.e COVID-19 Response
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

#### Questions for Review and Discussion

1. Explain how you complied with the implementations and guidance throughout the pandemic.

#### U.S. DEPARTMENT OF EDUCATION EDGAR/ UGG COVID FLEXIBILITY

- (Updated November 2020) [Donation of Loan of Personal Protective Equipment and Other Medical Supplies and Equipment Purchased with Federal Funds](#)
- (Updated October 2020) [Fact Sheet or Repurposing Federal Equipment and Supplies to Combat COVID-19](#)
- (August 2020) [Fact Sheet Regarding Contracted Services Not Performed Due to COVID-19](#)
- (June 18, 2020) [OMB Memo M 20-26, Extension of Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by COVID-19 due to Loss of Operations](#)
- (April 8, 2020) [Fact Sheet: Select Questions Related to Use of Department of Education Grant Funds During the Novel Coronavirus Disease 2019](#)
- (April 10, 2020) [Implementation Guidance for Supplemental Funding Provided in Response to COVID-19](#)
- (March 19, 2020) [OMB Memo M-20-17, Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus \(COVID-19\) due to Loss of Operations](#)

#### FERPA COVID RESOURCES

- (March 2020) [FERPA and COVID-19, Frequently Asked Questions](#)
- (March 2020) [FERPA and Virtual Learning Related Resources](#)

## HIGHER EDUCATION COVID RESOURCES

- (December 2020) [COVID-19 CARES Act Flexibilities Letter to Student Services Grantees](#)
- (December 2020) [COVID-19 Program Match Flexibility Letter to GEAR UP Grantees](#)
- (December 2020): [COVID-19 Institutional Service Letter](#)
- (July 2020): [COVID-19 Letter to HEP Grantees on Flexibilities Available Under CARES Act Section 3518](#)
- (June 2020) [COVID-19 FAQs for Title III, IV, V, and VII Grantees](#)
- (May 12, 2020) [Information on Protecting Higher Education Students' Civil Rights During COVID-19 National Emergency](#)
- (April 3, 2020) [Guidance for interruptions of study related to Coronavirus \(COVID-19\)](#)
- (March 2020) [Information for Accrediting Agencies Regarding Temporary Flexibilities Provided to Coronavirus Impacted Institutions or Accrediting Agencies](#)

## WORKFORCE/CTE COVID RESOURCES

- (May 29, 2020) [AEFLA and COVID-19 FAQs, Part 3](#)
- (April 17, 2020) [AEFLA and COVID-19 FAQs, Part 2](#)
- (April 17, 2020) [CTE and Adult Education Fiscal Waiver Invitation Letter for SEAs](#)
- (April 17, 2020) [CTE and Adult Education Fiscal Waiver Optional Template for SEAs](#)
- (April 10, 2020) [Perkins V Frequently Asked Questions Round 2](#)
- (March 31, 2020) [Perkins V Frequently Asked Questions](#)
- (March 26, 2020) [WIOA Performance Accountability Provisions and COVID-19](#)
- (March 27, 2020) [Adult ED Q&A](#)

Core Activity 3- Financial Management  
Objective 3.e – COVID-19

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does/did the provider donate federal grant-funded medical equipment and/or personal protection equipment and/or supplies to local, state, federal, tribal or territorial public health agencies in an effort to help with the COVID-19 Presidential declaration of a national emergency?	C	OMB Memo M-20-202 2 CFR 200.102	<input type="checkbox"/> Yes  <input type="checkbox"/> No	
2. Does/did the provider keep records, in accordance with OMB Memo M-20-202, of the disposition of all donated or loaned items and make the records available to the Department? Required records include, but are not limited to: a) a description of the types and quantities of the equipment or supplies that were donated or loaned; b) the source (the Federal program(s) funds involved) and the amount of Federal funding used to purchase the equipment or supplies; c) the entity or entities to which the equipment or supplies were donated or loaned; <b>and</b> d) the date of the donation or loan, and, if loaned, the date the loaned item(s) were returned to the grantee or subgrantee.	C	OMB Memo M-20-202	<ul style="list-style-type: none"> <li>• Inventory of donated and/or loaned medical equipment and/or supplies.</li> </ul>	

# CORE ACTIVITY 4

## Date Accountability and Reporting



**Address the grant recipient accountability processes for Adult Education and Career Technical Education reporting of accountability outcomes and other information submitted to the Department.**

Under Adult Education, the primary indicators of performance within the National Reporting Systems are the primary indicators of performance required by WIOA Section 116(b)(2)(A). These indicators are measurable skill gains, employment rate in the second quarter after exit, employment rate in the fourth quarter after exit, median earnings in the second quarter after exit, credential attainment, and effectiveness in serving employers. The U.S. Departments of Labor and Education have developed joint guidance for collecting, validating and reporting these measures. This guidance includes definitions, methodology, calculations, and operational parameters. OCTAE Program Memorandum 17-2 provides this guidance for adult education programs and also includes definitions of key terms related to accountability under WIOA. OCTAE Program Memorandum 19-1 provides guidance for validating data.

The division has developed accountability guidelines and operational procedures for secondary and postsecondary performance measures. These guidelines are reviewed annually, and significant changes in operational procedures are vetted with Management Information System(MIS) reports coordinators during standing meetings of FDOE 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://www.fl DOE.org/academics/career-adult-edu/funding-opportunities/>

### INTRODUCTION

The purpose of Core Activity 4 is to assist the reviewer in the evaluation of the grant recipient's Data Accountability and Reporting. Core Activity 4 is dissected into one objective to help the reviewer determine the grant's operations' compliance and effectiveness. Because each grant type has different programmatic requirements, the reviewer must carefully review each objective and its indicators to determine whether it applies to the grant under review.

Objective 4.a: AE & CTE Accountability: Management Information system set up for accountability of required information.

## INSTRUCTIONS

Each indicator in Core Activity 4 is identified as (C) for compliance that must be met or (E) for effectiveness that may not result in a compliance issue but can develop into one if not addressed. Issues identified as effectiveness issues may result in an area of concern and do not have to be formally addressed by the grant recipient in a formal response to the monitoring report. Regulatory citations are referenced in and throughout this activity, as most of these objectives are requirements of the UGG.

- ◆ The reviewer looks at each of the objectives and indicators to determine if applicable to the grant/program under review.
- ◆ If a further review of any of these systems is necessary based on the reviewer's findings, obtain copies of all documents relevant to the reviewer's conclusions to share with management as appropriate.
- ◆ If a compliance indicator is not met, it will result in a finding due to a violation (condition) of a specific compliance requirement in law, regulations, UGG, national policies, Grant Terms and Conditions, federal policy guidance, or the grant agreement. Negative responses to an indicator will lead to a determination of noncompliance. Collect evidence as adequate documents must support written findings and be contained in the review file.



## Objective 4.a: AE&CTE Accountability

*Management Information system set up for accountability of required information.*

### (C) Indicator 4.a: AE & CTE Accountability

**Citation:** WIOA 116, CFR 200.329, Rule 6A-10.0381, FDOE grant RFP/RFAs, Section 1008.385(2), Perkins V Section 113, WIOA 231 (e) (12), 20 U.S.C.123g, 34 CFR 99

#### Instructions:

- Review the following documents and utilize tools (as applicable):
  - ◆ Complete the Data Element Verification checklist for Secondary, Post-Secondary, College, Adult Education, College Adult Education. Refer to Tool G:
  - ◆ **Review and verify** samples of student data (provider) have previously submitted to FDOE. (Student names randomly selected by PERA) Refer to Resource A-Student Data Verification in the Appendix for further guidance.
  - ◆ Completed Objective 4.a: AE & CTE Accountability
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.**
- Ensure documentation provided satisfies the requirement.

#### Questions for Review and Discussion

1. Is the signed release of information, form or statement, kept in the student file? If NO where is the form kept? See USDOE OCTAE website regarding FERPA at <https://www2.ed.gov/about/offices/list/ovae/pi/cte/uiferpa.html> and 34 CFR §99.30 Under what conditions is prior consent required to disclose information.
2. What technical assistance and professional development opportunities from DCAE is the providers utilizing related to data collection, assessment, and follow-up? (For example: bi-monthly/quarterly webinars, WEDDAC, presentations at ACE and Summer Symposium, individualized assistance from DCAE staff, etc.):
3. Can the provider's local MIS read the test record and successfully identify out-of-range or out-of-date scores before awarding the LCP?
4. Does the provider provide any locally planned and delivered training annually on NRS issues, MIS, data entry or analysis issues? Briefly describe frequency, duration and content of training.



Core Activity 4- Data Accountability and Reporting

Objective 4.a – AE & CTE Accountability

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
1. Does the provider have written procedures for the collection, verification, analysis and reporting of student data?	C	2 CFR 200.329 Section 1008.385(2), F.S.	<ul style="list-style-type: none"> <li>• Policies and procedures on data collection and reporting</li> </ul>	
2. Does the provider use an electronic management information system that adheres to all requirements of the reporting system?	C	2 CFR 200.329 Perkins V Section 113 Section 1008.385(2), F.S.	<ul style="list-style-type: none"> <li>• Data Elements Collection Attestation Form</li> </ul>	
3. Does the provider have specific staff responsible for data collection, entry and verification of student data?	E		<ul style="list-style-type: none"> <li>• Position description(s)</li> <li>• Staff training and professional development records/documentation, training materials, etc.</li> </ul>	
4. Does the provider use an electronic management information system (MIS), used by all programs, with individual student records within a relational database structure?	C	<ul style="list-style-type: none"> <li>• WIOA Section 231(e)(12)</li> <li>• FDOE grant RFP/RFAs supporting AEFLA</li> </ul>	<ul style="list-style-type: none"> <li>• Name of electronic MIS</li> </ul>	
5. Does the agency's MIS track and report student attendance?	C	<ul style="list-style-type: none"> <li>• CFR 200.329</li> <li>• Rule 6A-10.0381</li> <li>• FDOE grant RFP/RFAs supporting AEFLA</li> </ul>	<ul style="list-style-type: none"> <li>• Sample of MIS generated student attendance roster</li> </ul>	
6. Does the provider have a procedure to ensure that the reported student data is valid and reliable?	C	WIOA 116(c)(5)	<ul style="list-style-type: none"> <li>• Copy of written procedure or description of the procedure used to determine that student data</li> </ul>	

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
			reported are valid and reliable.	
7. Does the provider procedurally withdraw students after six consecutive absences from a course?	C	<ul style="list-style-type: none"> <li>• CFR 200.329</li> <li>• Rule 6A-10.0381</li> </ul>	<ul style="list-style-type: none"> <li>• Attendance record reflecting a procedural withdrawal after six consecutive absences</li> </ul>	
8. Does the provider place the student in the same course and section if the student resumes enrollment within 30 calendar days of the procedural withdrawal?	C	<ul style="list-style-type: none"> <li>• CFR 200.329</li> <li>• Rule 6A-10.0381</li> </ul>	<ul style="list-style-type: none"> <li>• Attendance record reflecting a procedural withdrawal after six consecutive absences and a re-enrollment within 30 calendar days and the corresponding course schedule records.</li> </ul>	
9. Does the provider provide the individuals applying for or receiving services with the proper written notification regarding the use of their personal and confidential information?	C	<ul style="list-style-type: none"> <li>• 20 U.S.C. 1232g</li> <li>• 34 CFR 99</li> <li>• FDOE grant RFP/RFAs</li> </ul> <p style="margin-left: 20px;">supporting AEFLA</p>	<ul style="list-style-type: none"> <li>• Copy of the written notification</li> </ul>	

# CORE ACTIVITY 5 CARES ACT



**Two discretionary grants from Governor’s Emergency Education Relief (GEER) Fund under the Coronavirus Aid, Relief, and Economic Security (CARES) Act Fund. These opportunities will assist in adding training capacity for essential workforce skills and help the state prepare residents for in-demand and middle to high-wage careers.**

The Building K-12 CTE Infrastructure grant aims to provide resources for school districts to build infrastructure and increase enrollment in high-demand CTE programs. In addition, this funding aims to accelerate students’ readiness for work and/or immediate entry into an in-demand postsecondary CTE program. The targeted population is secondary career and technical education students in Florida public school districts. Allowable Expenses: limited to the cost associated with infrastructure and equipment related to offering a multi-course secondary CTE program to help districts scale sustainable solutions to high-quality instruction of CTE programs. Program funds must be used solely for activities that directly support K-12 students in CTE programs aligned with local labor market demand.

Building Rapid Credentialing Grant Opportunity aims to assist Florida College System (FCS) institutions and district postsecondary technical college/centers in their ability to enroll and complete students in short-term, in-demand workforce CTE credentialing and certificate programs. Funds are directed to connecting those unemployed, underemployed, or furloughed with training in an in-demand area of the regional workforce board. Funds may be used to purchase necessary equipment, underwrite costs associated with administering in-demand non-credit industry certification preparation or clock hour career certificate programs, or for-credit short-term CTE courses/programs. The target population is the postsecondary CTE students and students enrolled in non-credit workforce training. Allowable Expenses: Program funds must be used solely for activities that directly support accomplishing the program purpose, priorities and outcomes during the program period. All expenditures must be consistent with the approved application and applicable state and federal laws, regulations, and guidance. Unallowable Expenses: Expenses associated with Indirect Costs are unallowable. RFA includes a list of items or services that are generally not allowed or authorized as expenditures. This is not an all-inclusive list of unallowable items. Subrecipients are expected to consult the FDOE program office with questions regarding allowable costs.

## INTRODUCTION

The purpose of Core Activity 5 is to assist the reviewer in the evaluation of the grant recipient's CARE Act grant. Core Activity 5 is dissected into two objectives to help the reviewer determine the grant's operations' compliance and effectiveness. Because each grant type has different programmatic requirements, the reviewer must carefully review each objective and its indicators to determine whether it applies to the grant under review.

Objective 5.a: Building K-12 CTE Infrastructure: The Building K-12 CTE Infrastructure grant aims to provide resources for school districts to build infrastructure and increase enrollment in high-demand CTE programs.

Objective 5.b: Rapid Credentialing: Building Rapid Credentialing Grant Opportunity aims to assist FCS institutions and district postsecondary technical college/centers in enrolling and completing students in the short-term in-demand workforce/CTE credentialing and certificates programs.

## INSTRUCTIONS

Each indicator in Core Activity 5 is identified as (C) for compliance that must be met or (E) for effectiveness that may not result in a compliance issue but can develop into one if not addressed. Issues identified as effectiveness issues may result in an area of concern and do not have to be formally addressed by the grant recipient in a formal response to the monitoring report. Regulatory citations are referenced in and throughout this activity, as most of these objectives are requirements of the UGG.

- ◆ Focus specifically on management systems related to internal controls, financial reporting, payment and cash management, program income, allowable costs/cost classification, cost allocation, and indirect costs.
- ◆ If a further review of any of these systems is necessary based on the reviewer's findings, obtain copies of all documents relevant to the reviewer's conclusions to share with management as appropriate.
- ◆ If a compliance indicator is not met, it will result in a finding due to a violation (condition) of a specific compliance requirement in law, regulations, UGG, national policies, Grant Terms and Conditions, and federal policy guidance, and the grant agreement. Likewise, negative responses to an indicator will lead to a determination of noncompliance. Therefore, ensure to collect evidence as adequate documents must support written findings and be contained in the review file.



**Objective 5.a:**  
***Building K-12 CTE  
Infrastructure***

*The Building K-12 CTE Infrastructure grant aims to provide resources for school districts to build infrastructure and increase enrollment in high-demand CTE programs.*

**(C/E) Indicator 5.a: Building K-12 CTE Infrastructure**

**Citation:** FDOE RFA, Section 427 if GEPA, 2 CFR 200.313

**Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objectiv5.a. Building K-12 CTE Infrastructure
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

**Questions for Review and Discussion**

1. Did the provider provide resources for the school district to build infrastructure and increase enrollment in high-demand CTE programs?
2. Explain how you overcame any obstacles to accomplish this task.

Core Activity 5- CARES Act  
Objective 5.a – *Building K-12 CTE Infrastructure*

Question	C / E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<p>1. Did the provider adhere to the General Education Provisions Act (GEPA) Requirement?</p>	C	<p><u>Section 427 of GEPA, enacted as part of Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).</u></p>	<ul style="list-style-type: none"> <li>• Developed instruction material or the classroom</li> <li>• Submit special project effort</li> <li>• Brochure and evidence of distribution</li> </ul>	
<p>2. Did the LEA will provide equitable services to students and teachers in non-public schools as required under 18005 of Division B of the CARES Act.</p>	C	<p><u>FDOE RFA</u></p>	<ul style="list-style-type: none"> <li>• Policy and Procedure for equitable services for students and teachers in a non-public school</li> </ul>	
<p>3. Did the LEA will provide equitable services to students and teachers in non-public schools located within the LEA in the same manner as provided under section 1117 of the ESEA, as determined through timely and meaningful consultation with representatives of non-public schools.</p> <p>The LEA will ensure that a public agency will maintain control of funds for the services and assistance provided to a non-public school under the GEER Fund.</p> <p>The LEA will ensure that a public agency will have title to materials, equipment, and property purchased with GEER funds.</p>	C	<p><u>FDOE RFA</u></p>	<ul style="list-style-type: none"> <li>• Meeting agenda</li> <li>• Inventory spreadsheet for material and inventory</li> <li>• Contract, MOU</li> </ul>	

<p>The LEA will ensure that services to a non-public school with GEER funds will be provided by a public agency directly or through a contract with another public or private entity.</p>				
<p>4. Did the LEA and any other entity that receives GEER funds through the subgrant awarded hereunder will, to the greatest extent practicable, continue to compensate its employees and contractors during the period of any disruptions or closures related to COVID-19 in compliance with Section 18006 of Division B of the CARES Act. In addition, each entity that accepts funds will continue to pay employees and contractors to the greatest extent practicable based on the unique financial circumstances of the entity. CARES Act funds generally will not be used for bonuses, merit pay, or similar expenditures unless related to disruptions or closures resulting from COVID-19.</p>	<p>C</p>	<p><u>FDOE RFA</u></p>	<ul style="list-style-type: none"> <li>• Time and Effort reports</li> <li>• Financial records</li> </ul>	
<p><del>5. Did the LEA acknowledges that program funds awarded hereunder may be used to pay for allowable expenses up to 75%. The additional 25% may come from any source other than Carl D. Perkins funds, Workforce Innovation and Opportunity Act (WIOA) funds, Career and Professional Education Act</del></p>	<p><del>C</del></p>	<p><del><u>FDOE RFA</u></del></p>	<p><del>• Financial records</del></p>	<p>Waived by Chancellor Mack, see memo dated 3/29/2021, Governor's Emergency Education Relief (GEER)</p>

<del>(CAPE) funds, or district workforce funds.</del>				
<p>6. Did the LEA will comply with all reporting requirements and submit required bi-annual reports to the Florida Department of Education at such time and in such manner and containing such information as the department may subsequently require. The department may require additional reporting in the future, which may include: Uses of funds by the LEA and demonstration of compliance with Section 18002(c) of the CARES Act, including whether any use of funds was applied to support addressing the digital divide and related issues in distance learning; the number of public and non-public schools that received funds or services; and a description of internal controls the LEA has in place to ensure that funds were used for allowable purposes and in accordance with cash management principles.</p>	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Bi-Annual reports</li> </ul>	
<p>7. Did the provider increase enrollment, persistence and completion as outlined in the grants narrative? (PART C)</p>	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Generated enrollment reports</li> </ul>	
<p>8. Did the provider adhere to the inventory requirements for the purchase, protection, use, and disposal of equipment purchased with federal grant funds?</p>	C	<u>FDOE RFA</u>  <u>2 CFR</u> <u>200.313</u>	<ul style="list-style-type: none"> <li>• Inventory listing purchases made with CARES Act funds</li> </ul>	





**Objective 5.b:**  
**Rapid Credentialing**

*Building Rapid Credentialing Grant Opportunity aims to assist FCS institutions and district postsecondary technical college/centers in their ability to enroll and complete students in short-term, in-demand workforce/ CTE credentialing and certificates programs.*

**(C) Indicator 5.b: Rapid Credentialing**

**Citation:** FDOE RFA, 2 CFR 200.313, Section 427 of GEPA

**Instructions:**

- Review the following documents (as applicable):
  - ◆ Grant
  - ◆ Completed Objectiv5.b. Rapid Credentialing
- Assess if the indicator is compliance (C) or effectiveness (E) for the grant under review.
- Ensure documentation provided satisfies the requirement.

**Questions for Review and Discussion**

1. Did the provider enroll and complete students in short-term, in-demand workforce/CTE credentialing and certificates programs?
2. Explain how you overcame any obstacles to accomplish this task.

Core Activity 5- CARES Act  
Objective 5.b –Rapid Credentialing

Question			Collection/ Examples of Documentary Evidence	Notes
1. Did the college/district assure it will work with area-established non-profits and/or workforce boards in the engagement, completion, and/or placement of participants?	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Developed instruction material or the classroom</li> <li>• Submit special project effort</li> <li>• Brochure and evidence of distribution</li> </ul>	
2. Did the college/district assures it will work with area-established non-profits and/or workforce boards in the engagement, completion, and/or placement of participants.	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Agendas and Meeting notes</li> </ul>	
3. Did the college/district focus on either furloughed, unemployed, or employed participants but at risk of losing their job due to automation or disruption in the local economy due to COVID-19?	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Example of student file</li> <li>• Workforce referrals</li> <li>• Report from Florida Department of Economics Opportunities</li> </ul>	
<del>4. Did the college/district spend at least 75% of the total funds, including matching funds, on programs that lead to middle to high wage employment?</del>	C	<del><u>FDOE RFA</u></del>	<ul style="list-style-type: none"> <li><del>• Financial records</del></li> </ul>	Waived by Chancellor Mack, see memo dated 3/29/2021, Governor's Emergency Education Relief (GEER)
5. Did the college/district spend matching funds of at least 25% of the total CARES Act funds	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li><del>• Financial records</del></li> </ul>	Waived by Chancellor Mack, see

Question	C/E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
<del>for Rapid Credentialing on the programs identified in their application?</del>				memo dated 3/29/2021, (GEER)
6. Did the college/district develop a mechanism for tracking and documenting Assurances 1-4?	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Tracker for documentation</li> </ul>	
7. Did the college/district and any other entity that received GEER funds through the subgrant awarded hereunder to the greatest extent practicable, continue to compensate its employees and contractors during the period of any disruptions or closures related to COVID-19 in compliance with Section 18006 of Division B of the CARES Act? Did each entity that accepts funds will continue to pay employees and contractors to the greatest extent practicable based on the unique financial circumstances of the entity. CARES Act funds generally will not be used for bonuses, merit pay, or similar expenditures, unless related to disruptions or closures resulting from COVID-19?	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Contracts</li> <li>• Time and Effort reports</li> </ul>	
8. Did the college/district comply with all reporting requirements, and submit required bi-annual reports to the Florida Department of Education at such time and in such manner and containing such information as the department may subsequently	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Bi-annual reports</li> </ul>	

Question	C/E	Citation(s)	Methods of Collection/ Examples of Documentary Evidence	Notes
require. Did the department require additional reporting?				
9. How did the provider recruit students and provide advisement for the programs targeted for grant funds?	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Brochure</li> <li>• Advertisement</li> </ul>	
10. How did the provider employ or get the industry involved in those workforce programs identified as part of this application. How were students placed into the middle to high wage employment? What was your method(s) for tracking placement in related employment?	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Advisory board meeting notes</li> <li>• Training documents</li> <li>• Survey results</li> <li>• Tracking documentation</li> </ul>	
11. Provide an analysis of the return on investment associated with these funds based on the projected number of individual credentials and the total resources expended.	C	<u>FDOE RFA</u>	<ul style="list-style-type: none"> <li>• Final analysis report</li> </ul>	
12. Did the provider adhere to the inventory requirements to purchase, protect, use, and dispose of equipment purchased with federal grant funds?	C	<u>FDOE RFA</u>  <u>2 CFR</u> <u>200.313</u> Page 45	<ul style="list-style-type: none"> <li>• Inventory listing purchases made with CARES Act funds</li> </ul>	
13. Did the provider adhere to the General Education Provisions Act (GEPA) Requirement?	C	<u>Section 427 of GEPA, enacted as part of Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).</u>	<ul style="list-style-type: none"> <li>• Developed instruction material or the classroom</li> <li>• Submit special project effort</li> <li>• Brochure and evidence of distribution</li> </ul>	

# APPENDIX

## INTRODUCTION

The purpose of the Appendix to the Core Monitoring Guide (CMG) is to contain the tools and resources for staff to perform an in-depth review of indicators in the CMG. This Appendix, along with other supplements to the CMG, constitutes an integral part of the overall strategy to improve grant administration, specifically the on-site monitoring of grant recipients.

The Appendix is for general use and can be used on a variety of grant programs. The reviewer may tailor the resources and tools for their needs.

<u>Resources</u>	<u>Tools</u>
<b>Resource A:</b> Student Data Verification	<b>Tool A:</b> Grant Budget Analysis
<b>Resource B:</b> Cross- Reference of Grant Management	<b>Tool B:</b> Summary of Results/Notes
<b>Resource C:</b> Analysis for Monitoring	<b>Tool C:</b> Compliance Determination Tool
<b>Resource D:</b> Using Effective Interviewing Techniques	<b>Tool D:</b> Equipment Inventory
<b>Resource E:</b> Sampling Methodology	<b>Tool E:</b> Equipment Disposition Form
<b>Resource F:</b> Monitoring Finding Template	<b>Tool F:</b> Equipment COVID-19
<b>Resource G:</b> Procurement Standards	

## RESOURCE A: STUDENT DATA VERIFICATION

### Student Data Request

As monitors of your federal award, the Quality Assurance and Compliance monitoring staff are required to **review and verify** samples of student data you (provider) have previously submitted to FDOE. Please see below for a list of the documentation you will need to provide your monitoring team lead.

### Adult Education

AGE completers and non-completers: The monitoring staff will verify the accuracy of literacy completion points (LCPs) reported to FDOE. Once you receive your sample list of student data, the provider **shall** use their ShareFile to upload official TABE and/or CASAS test records for each student on your list (NOT AN EXCEL SPREADSHEET). The monitoring staff will need to verify each student's pre-and post-test scores to ensure the LCP's accuracy to the state.

### Career and Technical Education

Postsecondary completers: The monitoring staff will verify the accuracy of program completers reported to FDOE. Once you receive your sample list of student data, the provider **shall** use their ShareFile to upload copies of each student's transcript. The monitoring staff will need to verify that each student's transcript and course log match the program requirements to be recognized as a program completer.

Industry Certifications: The monitoring staff will verify the accuracy of earned industry certifications reported to the FDOE. Once you receive your sample list of student data, the provider **shall** use their ShareFile to upload copies of each student's actual industry certification. Official records from Certiport® or other official testing agencies will suffice if copies of the actual certifications are not available. The monitoring staff will need to verify that each student earned the industry certification reported to the state.

## RESOURCE B: CROSS-REFERENCE OF GRANT MANAGEMENT REQUIREMENTS

**PURPOSE:** This chart provides a cross-reference of grant management requirement references

Requirement	
Audit	<a href="#">2 CFR 200 Subpart F</a> ;
Audit Resolution	<a href="#">2 CFR 200.508</a> ; <a href="#">2 CFR 200.511</a> ; <a href="#">2 CFR 200.521</a> ;
Federal Cost Principles for Allowable Costs	<a href="#">2 CFR 200.400-419</a>
Treatment of Selected Items of Cost	<a href="#">2 CFR 200.420-475</a>
Uniform Administrative Requirements	<a href="#">2 CFR 200 Subpart D</a>
Lobbying Restrictions	29 CFR Part 93
Non-Discrimination (Civil Rights)	<a href="#">29 CFR Part 31</a>
Non-Discrimination (Basis of Handicap)	<a href="#">29 CFR Part 32</a>
Age Discrimination Act of 1975	<a href="#">29 CFR Part 35</a>
EO Requirements (WIOA only)	29 CFR Part 38
Title IX – Education Amendments Act of 1972	<a href="#">49 CFR Part 25</a>
FDOE Green Book-project application and amendment procedures for federal and state programs	<a href="#">Green Book</a>
FDOE Red Book- a uniform chart of accounts for financial, cost, and budgetary reporting and forms the basis for grant budgeting.	<a href="#">Red Book</a>
FDOE Florida College Accounting Manual	<a href="#">FCAM</a>

**Note:** Additional requirements may be contained in program regulations related to or RFA of the funded grant programs.

## **RESOURCE C: ANALYSIS FOR MONITORING**

### **PURPOSE:**

Below is a list of suggested analyses that a reviewer can add to their arsenal of tools to assist in conducting a monitoring review. A reviewer can use these analyses to identify areas to target and prioritize when planning on-site or desk monitoring. However, this list is not exhaustive, with many different analyses that can be performed.

### **CONTENT ANALYSIS**

Content analysis is a technique used to understand the meaning of the information provided that uncovers what, where, and when, enabling the reviewer to gain more knowledge about the project. For instance, doing a content analysis of a project prompts questions such as: What is the service provided? How is that service provided? When does that service occur in the grant's period of performance? Where is the service provided? Why is the service needed?

A key question: Is all of the information that should be part of the document present? There may be a possibility that not all the information is contained in a single document. Reviewers must read several other documents to get the whole picture. By doing so, they are simultaneously connecting new information with what they may already know about the grant.

### **CROSS-CHECKING ANALYSIS**

This analysis goes a step further than content analysis and asks that the reviewer further analyze data and identify how data sets relate to each other. Sometimes, using additional documents can provide more clarity or validate the results of a document. For example, use the remaining documents from the project's work plan and the Performance Report Period and cross-check records that seem appropriate with one another.

For the monitoring, activity/expenditures are checked against different documents, laws, Federal regulations, and Grant Terms and Conditions. A simple cross-checking analysis using the general ledger and payment vouchers can demonstrate to the reviewer supporting evidence for the procurement, payment, and approval process. Since most competitive grant recipients are not required to provide detailed financial or performance data, reviewers should focus on what must be submitted quarterly for their programs.

### **VARIANCE ANALYSIS**

Variance analysis is conducted to understand the difference between actual and planned data. By nature, variance analysis uses numbers; thus, documents such as budgets would be ideal for variance analysis. The analysis highlights the existence and size of variance during a review period established by the reviewer. Variance analysis can be a trend line that shows differences monthly or quarterly, which would significantly help analyze the data and give a financial picture of the grant's overall progress.

Since most competitive grant recipients are not required to provide detailed financial or performance data, reviewers should focus on what must be submitted quarterly for their programs.



# RESOURCE D: USING EFFECTIVE INTERVIEWING TECHNIQUES

**PURPOSE:** Use this resource as a guide for interviews.

Interviews are tools for gathering context often used to validate the information collected from multiple written sources. By conducting interviews, reviewers can identify causes and address them effectively.

Types of interviews range from completely unstructured in which the grant recipient staff speaks freely about any topic they desire to highly structured in which the reviewer asks a series of questions and directs the grant recipient staff to limit their answers and comments to only these questions directly. The quality of the data collected in an interview depends on both the interview design and the interviewer's skills.

The CMG is equipped with questions to help reviewers conduct a semi-structured interview. However, reviewers are not confined to the format. They are free to use an unstructured interview approach if that works for the particular subject about which the reviewer is inquiring. Sometimes, a reviewer can get much new information from an unstructured interview simply because the grant recipient staff feels at ease to speak freely and, thus, increases the validity of the data.

Several types of questions are used in interviews: closed-ended, open-ended, probing, reflective, and summarizing. Depending on the kinds of questions that are used, some interviews encourage lengthy and detailed replies, while others are designed to elicit short and specific responses.

## TYPES OF QUESTIONS

### **Closed-ended questions**

Provide direct answers to questions and leave limited opportunities for detail. These questions usually require the grant recipient staff to answer “yes” or “no” or provide exact information and precise details that answer the question.

For example, the reviewer may ask: Did you increase youth enrollment in the program for the year 2018? There is a possibility that the grant recipient staff responds by saying yes by 50%. However, if the staff answered no, it unlocks the reviewer's opportunity to ask open-ended questions.

### **Open-ended questions**

Define the topic being reviewed but also provides opportunities for the reviewer to discuss the topic. With open-ended questions, the grant recipient staff has the opportunity to clarify their responses.

For example, the reviewer may ask: In the past, how did the staff promote youth participation in the program? The chances are that the grant recipient iterates all the

practices that led to increasing youth participation. The reviewer can pick a few of these answers and probe the grant recipient staff for further explanation.

### **Probing questions**

There are other techniques used during interviews. For example, reviewers can use probing to go deeper into a particular subject or answer to understand the rationale or reason. Probing gives the grant recipient staff more latitude to provide further details. For example, during probing, a reviewer may ask: You said *x* and *y*, now what is the difference between those two? What do you think would happen if...?

### **Reflective questions**

Require the grant recipient staff to reflect on a situation and describe it. Such a technique allows the grant recipient staff to detail the cause and effect of a problem.

For example, the reviewer may ask: What other facts or issues do you think are relevant to your program's low youth participation?

Lastly, it is of utmost importance to relate the information the grant recipient staff shared back to the staff by summarizing the discussion's key points. Summarizing critical information reiterates what was said, acknowledges the grant recipient staff's opinion, displays the reviewer's ability to listen, and confirms the reviewer's understanding of what was discussed. Summarizing is not always an indication that the interview is concluded. Sometimes, it helps to summarize parts of a discussion in order to ask a very specific question.

For example, the reviewer may ask: To summarize, *x* happened. So now you plan on doing what about it?

## RESOURCE E: SAMPLING METHODOLOGY

### PURPOSE:

A representative sampling of the total population pool should be used when determining samples for testing. For example, where training is a vital component of the grant, reviewers should select a sample from a listing that contains the entire population and consider selecting files for participants not yet in training, both participants in short- and long-term training options and participants who completed and dropped out of training those that found employment post-training and those who did not participants from different training providers, and a mix of occupations for which training was selected.

Below are some general steps to keep in mind when sampling:

1. **Define the population:** Defining the target population should be in line with the objective of the review. Therefore, the reviewer's first step in selecting a good sample is to draw different elements from the database to ensure that the target population is well represented. Try to obtain the population pool in the most automated way possible for ease of sampling (e.g., use a database spreadsheet file and filter through by age, years of participation, or other parameters established by the grant recipient's system.)
2. **Specify a sampling frame:** The target population is sampled using a sampling frame. Often, the population units can be identified by existing information (e.g., participant listing, general ledger, a listing of contracts, payroll records, etc.). A sampling frame could also be dollar amounts; for example, select costs more than a specific dollar amount (e.g., costs in excess of \$150,000 are selected).
3. **Specify a sampling method:** There are two ways to choose a sample from a sampling frame: randomly or non-randomly. There are benefits to both. If the sampling frame is approximately the same demographic makeup as the population, it would probably be more beneficial to select the sample randomly. For example, when selecting participant records, if participants are all youths in the same age group and from the same service delivery area, it would make sense to select a sample at random versus selecting a sample non-randomly.
4. **Determine the sample size:** In general, larger samples are better, but they also require more time and effort to manage. For example, if the reviewer makes a sample size of 25 participant records, it takes more time than if they only have to go through 10 records. But the results of their review are more substantial with 25 participant records reviewed versus 10. The reviewer has to make choices and find a balance between what gives them assurance regarding the grant recipient's progress and performance against grant performance goals and what is practical for the existing constraints (e.g., time, money, etc.).
5. **Select samples:** Once the reviewer knows the population, sampling frame, sampling method, and sample size, the reviewer can use all that information to make an informed decision on their sample.

## RESOURCE F: MONITORING FINDING TEMPLATE

**PURPOSE:** Use this resource to capture information on findings.

*Disclaimer: This is not a report format. It is a tool that can be used to ensure all relevant information regarding a finding is captured while on site.or during a desk monitoring review.*

**CONDITION** The topic sentence of the finding. A clear, concise, and specific statement describing the violation of law, regulations, UGG, State policies, etc.

**CAUSE** The reason the condition occurred. For example, what is or was the grant recipient doing or not doing that resulted in the condition.

**CRITERIA** Identify the legal citations that support the condition.

**CORRECTIVE ACTION** Identify the action(s) required to eliminate the cause and thus the condition.

# RESOURCE G: PROCUREMENT STANDARDS

**PURPOSE:** A quick reference to the UGG’s procurement standards.

## UGG 2 CFR 200.317 - 200.327

**States** - When procuring property and services under a Federal award, a State must follow the same policies and procedures it uses for procurements from its non-Federal funds ([2 CFR 200.317](#)).

**All other non-federal entities** - Must adhere to the UGG at 2 CFR 200.318 through 200.327,

All **subrecipients** must adhere to the UGG at [2 CFR Part 200](#)

### General Procurement Standards:

1. Establish **written** policies and procedures that address the procurement of goods and services.
  - a. Establish settlement procedures related to disputes, protests, source evaluations, and claims.
2. A **method of procurement** to be used during the procurement process. Non-Federal entities are required to use methods of procurement described in [2 CFR 200.320](#) when competitively procuring.
3. Use of **full and open** competition.
  - a. Procurement transactions must not restrict competition.
  - b. Application of policies in all Federal and non-Federal procurements must be consistent.
4. Establish **written standards of conduct** that address disclosure of real, apparent, and organizational conflict of interest for all involved parties, such as staff and Board members.
5. A process that promotes **transparency** and awarded only to **responsible** entities.
6. Avoid the purchase of **unnecessary** or **duplicative** items.
7. Policies and procedures that address non-competitive or **sole-source** procurement.
8. **Document** and make available for review the procurement history to include, but not limited to:
  - a. The rationale for the procurement method
  - b. The rationale for contract type including MOUs
  - c. The basis for contractor selection or rejection
  - d. The basis for contract price or award amount
  - e. Separately negotiated profit\*
9. Must use a **cost and price analysis** for all procurements in **excess** of the Simplified Acquisition Threshold (small purchases), including modifications. An independent estimate of costs before receiving bids or proposals must be documented.

# TOOL A: GRANT BUDGET ANALYSIS TOOL

**PURPOSE:** To assist the reviewer in performing a budget-to-actual comparison.

**Use:** Enter data from the grant recipient’s Project Disbursement Report (FDOE 399 or 499) and the grant recipient’s executed budget narrative.

Excel version located in the Compliance drive folder under templates.

Object Code	Description	Original Grant	Amendment 1	Amendment 2	Actual Budget	FA 399/499	399 vs. Actual	Disbursed	Unexpended Balance Actual	Unexpended Balance 399/499	
52300	Instructional - Para-Professional/Associate/Assistant	\$90,370.00	(\$7,027.00)	\$0.00	\$83,343.00	\$83,343.00	\$0.00	\$91,870.02	(\$8,527.02)	(\$8,527.02)	
53000	Other Professional	\$101,915.00	\$1,764.00	\$0.00	\$103,679.00	\$103,679.00	\$0.00	\$104,089.79	(\$410.79)	(\$410.79)	
54000	Technical, Clerical, Trade and Service	\$33,027.00	(\$4,043.00)	(\$4,047.00)	\$24,937.00	\$23,681.00	\$1,256.00	\$21,129.66	\$3,807.34	\$2,551.34	
59100	Social Security Contributions	\$17,235.00	(\$266.00)	(\$1,014.00)	\$15,955.00	\$13,282.00	\$2,673.00	\$13,207.90	\$2,747.10	\$74.10	
59101	FICA/Medicare Contributions	\$0.00	\$0.00	\$0.00	\$0.00	\$3,106.00	(\$3,106.00)	\$3,088.89	(\$3,088.89)	\$17.11	Added no prior approval
59200	Retirement Contributions	\$19,665.00	(\$1,220.00)	(\$583.00)	\$17,862.00	\$0.00	\$17,862.00	\$0.00	\$17,862.00	\$0.00	
60500	Travel	\$15,000.00	\$0.00	(\$500.00)	\$14,500.00	\$0.00	\$14,500.00	\$0.00	\$14,500.00	\$0.00	
60502	Travel - Out-of-District	\$0.00	\$0.00	\$0.00	\$0.00	\$4,544.55	(\$4,544.55)	\$9,460.20	(\$9,460.20)	(\$4,915.65)	
60503	Travel - Out-of-State	\$0.00	\$0.00	\$0.00	\$0.00	\$9,955.45	(\$9,955.45)	\$10,055.45	(\$10,055.45)	(\$100.00)	
62000	Printing	\$20,807.00	\$0.00	\$1,100.00	\$21,907.00	\$0.00	\$21,907.00	\$0.00	\$21,907.00	\$0.00	
62001	Printing/Duplicating - Vendor	\$0.00	\$0.00	\$0.00	\$0.00	\$21,907.00	(\$21,907.00)	\$8,655.73	(\$8,655.73)	\$13,251.27	
64501	Other Services	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$500.00	(\$500.00)	(\$500.00)	Added no prior approval
64510	Advertising (Not Required by Law)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13,075.00	(\$13,075.00)	(\$13,075.00)	Added no prior approval
64514	Technology Services	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$500.00	(\$500.00)	(\$500.00)	Added no prior approval
65500	Educational, Office/Department Materials and Supplies	\$6,180.00	\$0.00	\$7,619.00	\$13,799.00	\$0.00	\$13,799.00	\$0.00	\$13,799.00	\$0.00	
65501	Educational Materials and Supplies	\$0.00	\$0.00	\$0.00	\$0.00	\$13,299.00	(\$13,299.00)	\$13,535.47	(\$13,535.47)	(\$236.47)	
65502	Office Materials and Supplies	\$0.00	\$0.00	\$0.00	\$0.00	\$500.00	(\$500.00)	\$698.08	(\$698.08)	(\$198.08)	
65700	Data Software - Non-Capitalized	\$3,000.00	\$0.00	(\$500.00)	\$2,500.00	\$0.00	\$2,500.00	\$0.00	\$2,500.00	\$0.00	
65701	Data Software - Educational, Non-Capitalized	\$0.00	\$0.00	\$0.00	\$0.00	\$2,500.00	(\$2,500.00)	\$2,500.00	(\$2,500.00)	\$0.00	
66500	Other Materials and Supplies	\$118,000.00	(\$4,470.00)	\$0.00	\$113,530.00	\$0.00	\$113,530.00	\$0.00	\$113,530.00	\$0.00	
66506	Minor Equipment (Optional Account)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,244.60	(\$1,244.60)	(\$1,244.60)	
65507	Technology Material	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,417.19	(\$1,417.19)	(\$1,417.19)	Added no prior approval
	Column Totals (column H = sum of D, E, F and G)	\$495,386.00	\$59,344.00	\$0.00	\$554,730.00	\$554,730.00	\$0.00	\$552,893.44	\$1,836.56	\$1,836.56	

## **TOOL B: SUMMARY OF RESULTS / NOTES**



# **SUMMARY OF RESULTS REVIEWER NOTES**

---

### **Findings**

---

### **Follow-Up Items**

---

### **Areas of Concern**

---

### **Promising Practices**

---

### **Other Observations**

---

## TOOL C: COMPLIANCE DETERMINATION TOOL



# COMPLIANCE DETERMINATION TOOL

**PURPOSE:** Use the tool below to identify items you want to explore further with the grant recipient. Determine if it is a requirement of the grant by identifying a citation. Request documentation or interview the grant recipient to verify compliance. Write your conclusion in the final column. Use this tool as a list of things you want to explore through interviews, research, and documentation.

Issues	Citation	Supporting Documentation	Conclusion
(item to explore)	(is this a requirement and what says it's a requirement)		(Finding, Observation, AOC, Best Practice)



# TOOL D: EQUIPMENT INVENTORY

**PURPOSE:** To assist the reviewer by making available an example equipment inventory with the required data elements.

**Use:** Review the inventory submitted by the provider.

## Perkins-Funded Equipment Inventory 2 CFR 200.313

Acquisition Date	Description of Item	Serial Number	Model Number	Other Identification Number	Unit Cost	Funding Source(s) including the FAIN	Who holds the title?	% of Cost by Source	Location of Item	Use and Condition	Date of Inventory	Disposition Data	COVID 19 Donated or Loaned
9/28/18	Camcorder	1140512	HDC-CX250	TAG # 1	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
9/28/18	Camcorder	1140513	HDC-CX250	Tag #2	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
9/28/18	Camcorder	1140514	HDC-CX250	Tag # 3	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
4/15/19	3-D Printer	1142425	HDC-CX250	Tag #4	\$1,230.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135750	HDC-CX250	Tag #5	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135751	HDC-CX250	Tag #6	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135752	HDC-CX250	Tag# 7	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		

# TOOL E: EQUIPMENT DISPOSITION FORM

**PURPOSE:** To assist the reviewer in identifying an Equipment Disposition Form.

**TEXTBOOKS, SENSITIVE INVENTORY ITEM, EQUIPMENT, OR FIXED ASSETS DISPOSITION FORM**

DISPOSE                       TRANSFER                       RESELL

School/Department: \_\_\_\_\_ Contact Name: \_\_\_\_\_ Date: \_\_\_\_\_

**DIRECTIONS:** Complete sections A for textbooks and submit to Assistant Superintendent of Instruction.  
Complete sections B for sensitive inventory item, equipment or fixed assets and submit to Asst. Supt. of School Adm.

**SECTION A - TEXTBOOKS**

Title and Author of textbook: \_\_\_\_\_

Number of copies to discard: \_\_\_\_\_ Copyright date: \_\_\_\_\_ Reason for discard: \_\_\_\_\_

Disposition (circle): Auction Discard Transfer to \_\_\_\_\_ or Available to other locations  
(include a contact person's name)

Principal's/Supervisor's signature \_\_\_\_\_ Date \_\_\_\_\_

Assistant Superintendent/Superintendent's signature \_\_\_\_\_ Date \_\_\_\_\_

Purchasing Manager's signature \_\_\_\_\_ Date \_\_\_\_\_

I verify that the above items were picked-up \_\_\_\_\_ Date \_\_\_\_\_ I verify that the above items were transferred \_\_\_\_\_ Date \_\_\_\_\_

**SECTION B – SENSITIVE INVENTORY ITEM, EQUIPMENT OR FIXED ASSETS**

Type of equipment/fixed asset or furniture: \_\_\_\_\_

(Note: For multiple items please attach a list)

Manufacturer: \_\_\_\_\_ Model: \_\_\_\_\_

Fixed Asset barcode #: \_\_\_\_\_ Serial #: \_\_\_\_\_

Original funding for this equipment (if known circle): Local Grant (name): \_\_\_\_\_ Other: \_\_\_\_\_

Disposition (circle): Auction/Resell Dispose Transfer to \_\_\_\_\_ or Available to other locations  
(include a contact person's name)

Reason for discard: \_\_\_\_\_ Location of discarded items: \_\_\_\_\_

Principal's/Supervisor's signature \_\_\_\_\_ Date \_\_\_\_\_

Assistant Superintendent/Superintendent's signature \_\_\_\_\_ Date \_\_\_\_\_

Purchasing Manager's signature \_\_\_\_\_ Date \_\_\_\_\_

Sensitive Inventory Custodian \_\_\_\_\_ Date \_\_\_\_\_

I verify that the above items were picked-up \_\_\_\_\_ Date \_\_\_\_\_ I verify that the above items were transferred \_\_\_\_\_ Date \_\_\_\_\_

- ROUTING:**
1. Principal/Department Head signs and sends to Asst. Supt. of Instruction or Asst. Supt. of School Adm.
  2. Assistant Superintendent signs and sends to Accounting.
  3. Warehouse arranges for pickup and disposition.



# TOOL F: EQUIPMENT-COVID-19 DONATION OR LOAN OF PERSONAL PROTECTIVE EQUIPMENT AND OTHER MEDICAL SUPPLIES AND EQUIPMENT PURCHASED WITH FEDERAL FUNDS

**PURPOSE:** To assist the reviewer in identifying that the required FDOE COVID-19 spreadsheet must be used to record all donated or loaned personal protective equipment or medical supplies and equipment purchased with federal funds during this pandemic.

FLDOE COVID-19  
 Donation or Loan of Personal Protective Equipment and Other  
 Medical Supplies and Equipment Purchased with Federal Funds

Did you loan or donate the equipment?	The date of the donation or loan	If loaned, the date the loaned item(s) were returned to the grantee or sub grantee.	Description of the types equipment or supplies that were donated or loaned	Quantities of equipment or supplies donated or loaned	Inventory Tag number or Serial Number	The source (the Federal program(s) funds involved)	The amount of Federal funding used to purchase the equipment or supplies.	The entity or entities to which the equipment or supplies were donated or loaned.	Contact Name, phone number and address
A	B	C	D	E	F	G	H	I	J
EXAMPLE: Loaned	4/7/2020	9/11/2020	Medical ventilation machine	1	PA-900B	Perkins Y19	\$5,000.00	CR Memorial Hospital	John Doe, 850-999-9000 100 Loaned Street, Tallahassee FL 323000

**Please address inquiries to:**

**Kara Kearce  
Director of Quality Assurance and Compliance  
Kara.Kearce@fldoe.org  
(850) 245-9033**

**Florida Department of Education  
Division of Career, Technical and Adult Education  
325 West Gaines Street · Room 722A  
Tallahassee, FL 32399**