Webinar Logistics

- **Welcome and thank you for joining us.**

- **Recording and PowerPoint presentation (pdf version) titled "Fall 2022 Provider Training" is available at: http://www.fldoe.org/academics/career-adult-edu/compliance**

- **All participants have been muted for the recording.**

- **Please type questions into the question box.**

Highlights

This training will highlight the following:

- Regulatory Requirements
- The Roadmap of Compliance
- Risk Assessment
- Provider Selection
- Monitoring Procedures
- Schedule
- Records Review
- Examples of Monitoring Findings
- General Concerns & Best Practices
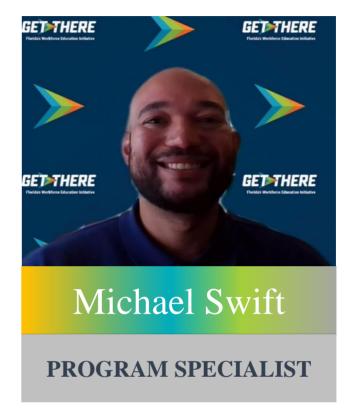- Frequently Asked Questions

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Bureau of Grants Administration and Compliance

Fiscal Years & Programs Monitored

Grant Programs to be monitored:

Adult Education (AE)
Leadership, AGE, Corrections, IELCE

Carl D. Perkins (CTE)
Secondary, Post-Secondary, Rural, DJJ

Fiscal Years (FY) monitored:
2019-20, 2020-21 and 2021-22 and current year 2022-23

Regulatory Requirements

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Important Statutory Citations/Requirements

State:

- Florida Statutes, Bills, Appropriations, Rules

- Florida Administrative Code

- CFO Memos

- Reference Guide for State Expenditures

- Catalog of State Financial Assistance

- Green Book, Red Book, Florida Accounting Manual

Federal:

- Federal Award Regulations (Perkins V, WIOA, USDOL)

- CFDA (Catalog of Federal Domestic Assistance)

- 2 CRF Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirement for Federal Awards

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The Roadmap of Compliance

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The Roadmap of Compliance

1. Risk Assessment

The process the QAC uses to evaluate variables associated with the grants and assign the provider's level of risk rating.

2. Notification and Training

Chancellor approves the new providers to monitor; schedule is solidified, letters and training information sent out.

3. Monitoring Review

On-site and Virtual reviews, look through items on ShareFile, Inventory, Grant Budget Analysis.

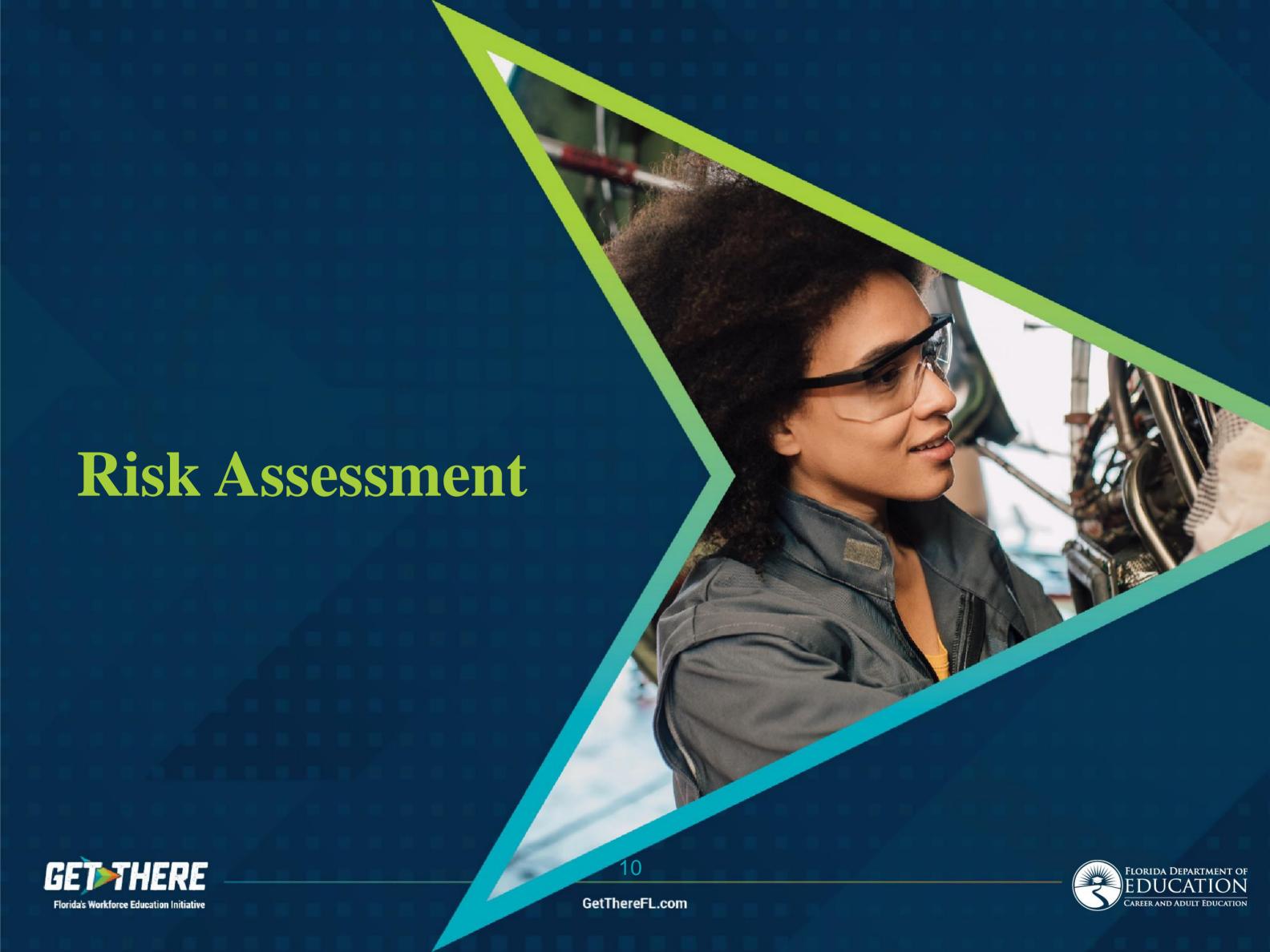**4. Review Wrap up**

Exit meeting, preliminary and final report.

5. File and Folder Cleanup

ShareFile transferred and deleted; Grant (working) files updated.

6. Yearly Preparation

Meeting and implementation for updates on Core Activities, Core Monitoring Guide (CMG), make recommended changes from feedback of surveys and program experts.

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Risk Assessment

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Implementation of a Risk-Based System

- Based on project and provider risk.

- Collaborative in nature.

- Recognizes positive practices.

- Identifies findings and concerns for program quality and compliance.

- Supports systemic and continuous program improvement.

Risk Assessment Factors 2022-23

- Adult Education Program Improvement Plan (AE)

- Change in Management Information System (MIS)

- Last monitoring review

- Change in Director

- Amount of grants

- Total budget of all Perkins V or WIOA grants combined

- Number of grant funds remaining

- Audit/monitoring findings

Risk Assessment Process

Calculation of the Risk Score:

Point Value Assigned X Weight = Total Metric Point

Sum of all Metric Points = Agency Risk Score

IMPORTANT! A **high-risk** assessment score should **NEVER** be interpreted as a negative reflection on the provider.

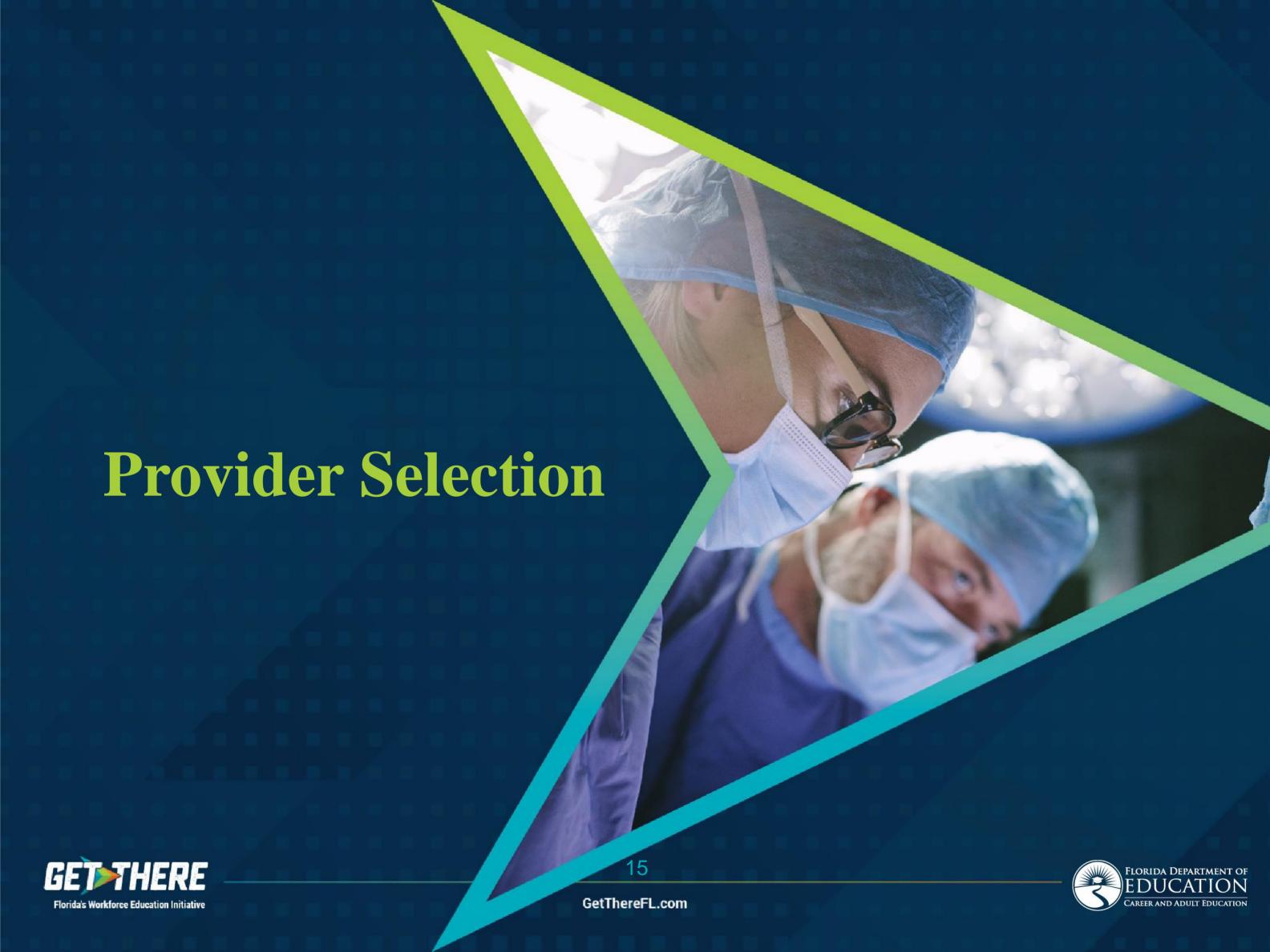**Carl D. Perkins Grants**   **Agency Name: Sunshine State College**

Target Year: 2019 2020 (Monitoring Year 2022 2023)

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)
Number of Years Since the Agency Was Last Monitored	7 or more years	7	5	X 10	50
	5-6 Years	5			
	3-4 Years	3			
	0-2 Years	1			
Total Budget for all Perkins Grants Combined	Upper Quartile	7	5	X 8	40
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
Number of Perkins Grants	4+	7	7	X 8	56
	3	5			
	2	3			
	1	1			
Change in Management Information System (MIS) from Previous Fiscal Year	Yes	7	0	X 6	0
	No	0			
Agency CTE Program Director Change from Previous Fiscal Year	Yes	7	7	X 6	42
	No	0			
Unexpended Funds from all Perkins Grants Combined	Upper Quartile	7	1	X 4	4
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
# OAG Audit Findings	Upper Quartile	7	3	X 4	12
	Upper Middle	5			
	Lower Middle	3			
	Lower Quartile	1			
	0	0			
				AGENCY RISK SCORE:	204

Provider Selection

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Fall 2022 Provider Selection

School Districts:

- St Johns County School District

- Flagler Schools

- St Lucie Public Schools

- Polk County Public Schools

State Colleges and Universities:

- Indian River State College
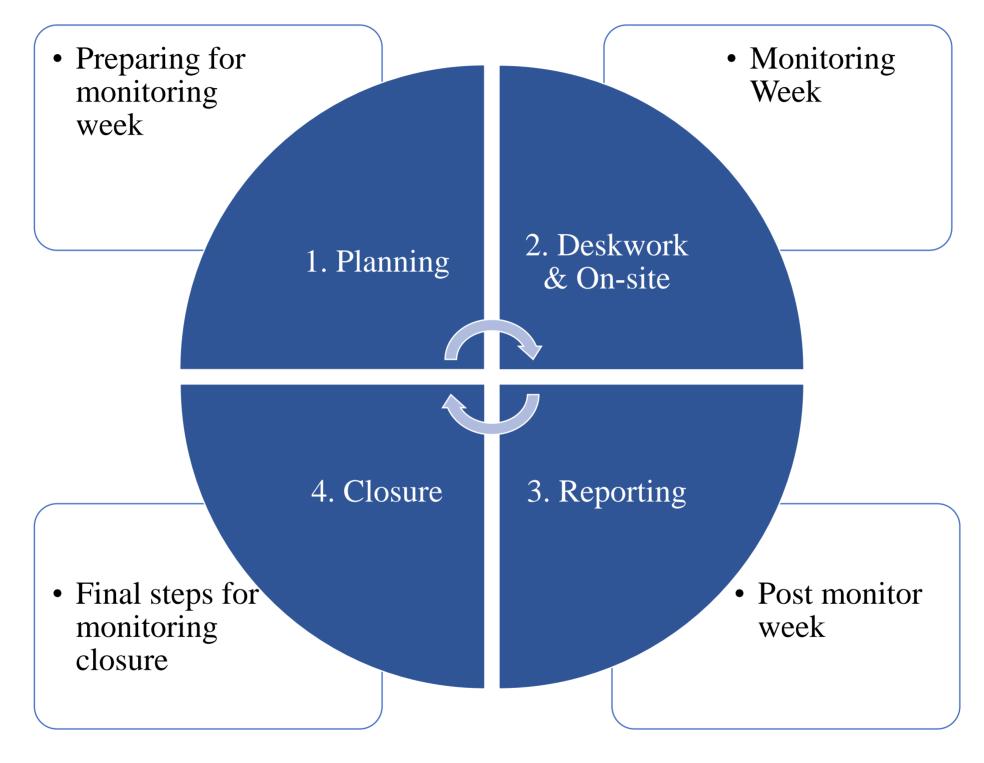
- Seminole State College of Florida

- Broward College

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Monitoring Procedure

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Monitoring Circle of Life:

- Preparing for monitoring week

- Monitoring Week

1. Planning

2. Deskwork & On-site

4. Closure

3. Reporting

- Final steps for monitoring closure

- Post monitor week

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Monitoring Circle of Life:
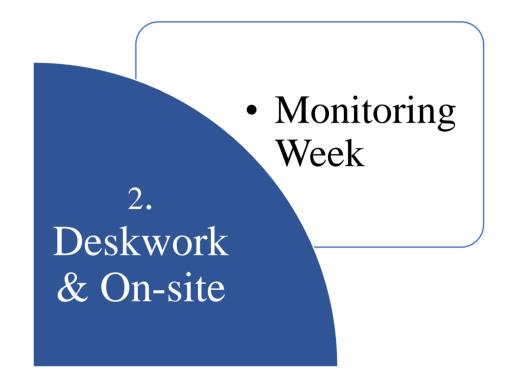
- Preparing for monitoring Week

1.
Planning

- Defining Monitoring Core Activity and Objective's

- Creating ShareFiles

- Designate POC for provider

- Send Notification Letters to Superintendents and Presidents

- Send Memorandum from director of Quality Assurance and Compliance

- Finalize the schedule

- Pre-visit reports from FDOE Program Staff

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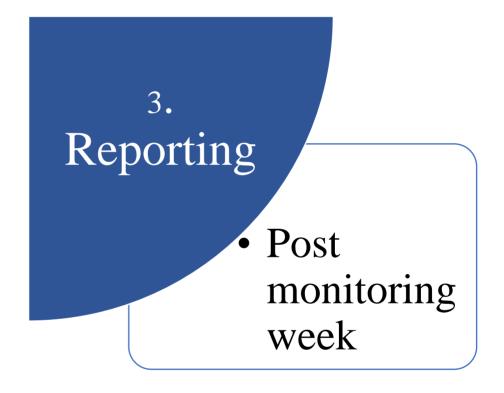CAREER AND ADULT EDUCATION

Monitoring Circle of Life:

- Entrance Meeting

- Gather Evidence to accomplish Core Objectives

- Conducting Interviews

- Reviewing Gathered Evidence

- When onsite, conduct a visual inventory check of provider's equipment purchased with grant funds by site/location.

- Exit Meeting

- Monitoring Week

2. Deskwork & On-site

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Monitoring Circle of Life:

- Communicate monitoring results

- Write Preliminary Report and thank-you letters for Provider

- Collaborate and create corrective action plans

- Obtain corrective action plans for findings
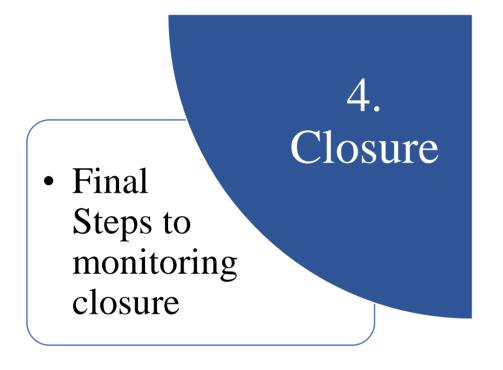
- Write Final Report to be posted

3.
Reporting

- Post monitoring week

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Monitoring Report Inclusions:

- Administration

- Data

- Curriculum and Instruction

- Financial

- Records Review

- Technology and Equipment

- Collaboration

Previous monitoring reports are available to review online:

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

Monitoring Circle of Life:

4. Closure

- Final Steps to monitoring closure

- Provide Technical Assistance

- Follow-up staff interview (as needed)

- Review corrective action plan and results (as needed)

- Final report submitted and sent to Superintendent

BONUS BEST PRACTICE:
Keep digital folders of the Core Activity evidence and update annually for future monitoring's!

Schedule

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OSMR Schedule Example

- Schedule is broken down to the hours of day and team members

- Accounts for travel time between sites for interviews and inventory checks

- Very rigid schedule, does not allow for flexibility.

- Core Activity 1-4 have specific time frames

- Team members know exactly how much time is allotted to each task within the schedule

- Schedule averages 2 to 3 days

Records Review

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Records Review: FDOE ShareFile

Purpose:

- Citrix ShareFile® is the Florida Department of Education's (FDOE) cloud-based secure file transfer solution. This solution is used to transfer files that are confidential, as well as too large and/or too numerous to send in a single email.

- Maintain compliance with the Family Education Rights and Privacy Act (FERPA).

Records Review: FDOE ShareFile

- ShareFile is ready to start uploading documents.

- Link to sign on: [ShareFile Login](#)

- Unique ShareFile name:
  o Example: OSMR_Fall_2022_provider's name

- To add additional users please email the name and email address of the individual to be added to your monitoring point of contact and we will make sure to get all inquiries processed.

Records Review: FDOE ShareFile

Each folder will be set up by Core Activity 1 through 4

Records Review: FDOE ShareFile

The Core Activity folder will have the Objectives (shown below)

DCAE > QAC - Compliance Review > Virtual Desk & On-site Monitoring Reviews 2021-22 > Example School District or College > Core Activity 1 - CTE

📁 Core Activity 1 – CTE ⋯ More Options

📁 Items in this Folder   👤⁺ People on this Folder

	Name ▲	Size
☆ DOC	CA1_Objective 1.b - Local Application for CTE.docx	26 KB
☆ DOC	CA1_Objective 1.a - Accountability.docx	23 KB
☆ DOC	CA1_Objective 1.c - Local Use of Funds.docx	22 KB

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Records Review: Objectives

Question

Evidence

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
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: a. introductory courses or activities focused on career exploration and career awareness, including non-traditional fields; 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; c. programs and activities related to the development of student graduation and career plans; d. career guidance and academic counselors that provide information on postsecondary education and career options; e. any other activity that advances knowledge of career opportunities and assists students in making in-formed decisions about future education and employment goals, including non-traditional fields; **or** f. providing students with strong experience in, and comprehensive understanding of, all aspects of an industry?	C	Perkins Sec. 135(b)(1)	• Coordination of student outreach programs (open house, information night, student advising session (postsecondary) • Career and Student Technical Organization roster(s) • Student training(s) • Guidance counselor training on CTE program offerings	

Law

Notes

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Organize Objective's Evidence

Evidence file path should be labeled by Core Activity, Objective and the question number on the Objective.

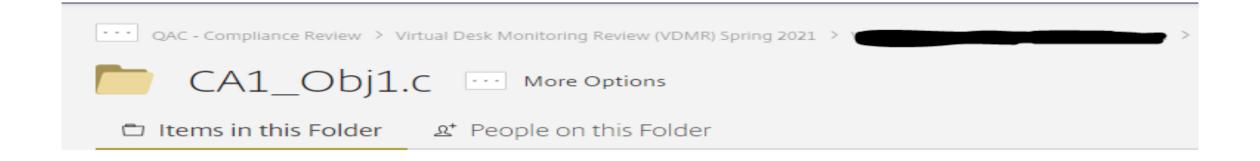Example: Core Activity 1, Objective 1a, question number 1
- CA1_1a_1

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	Florida's Perkins V State Plan	• Completed Perkins Program of Study *protocol*	

Organize Objective's Evidence

QAC - Compliance Review > Virtual Desk Monitoring Review (VDMR) Spring 2021 > ████████████████ >

📁 CA1_Obj1.c ⋯ More Options

📁 Items in this Folder   👤 People on this Folder

☐ **Name** ▲

☐ ☆ 📕 CA1_Obj1.c_1.pdf

☐ ☆ 📕 CA1_Obj1.c_2.pdf

☐ ☆ 📕 CA1_Obj1.c_2_ ADA trainings schedule.pdf

☐ ☆ 📕 CA1_Obj1.c_2_ ADAtraining-facultyorientation.pptx

☐ ☆ 📕 CA1_Obj1.c_2_College-wide Faculty Meeting 08152018.pdf

☐ ☆ 🖼 CA1_Obj1.c_2_Convocation 2019.jpg

☐ ☆ 📕 CA1_Obj1.c_2_New Faculty Academy_Agenda.pdf

☐ ☆ 📕 CA1_Obj1.c_2_PDD 2019.pdf

☐ ☆ 📕 CA1_Obj1.c_2_WEQC Agenda_11.2.2018.pdf

☐ ☆ 📕 CA1_Obj1.c_2_WEQC Meeting Minutes 11-2-18_final.pdf

☐ ☆ 📕 CA1_Obj1.c_3_18-19 Aersopace Advisory Meeting Minutes.pdf

☐ ☆ 📕 CA1_Obj1.c_3_18-19 Criminal Justice Advisory Meeting Minutes.pdf

Records Review: Student Data

- The Bureau of PK-20 Education Reporting and Accessibility (PERA) randomly selects student names.

- Selected student name will be provided during the monitoring review.

- All documentation must be uploaded to the secure ShareFile **or** viewed on-site.

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Records Review: Student Data

Adult Education

- AGE completers and non-completers

- Purpose to verify the accuracy of literacy completion points (LCPs) reported to FDOE.

- Once you receive your sample list of student data, the provider may 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.

Records Review: Student Data

Career and Technical Education

- *Post-secondary completers*: verify the accuracy of program completers reported to FDOE.
  - Use 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*: verify the accuracy of earned industry certifications reported to the FDOE.
  - Use 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.

Internal Control Policies and Procedures

- Conflict of Interest

- Fraud

- Travel

- Inventory/equipment

- Procurement

- Allowability

- Gratuity

- Cash Management

- Retention of Records

*All items listed **MUST** be in writing*

General Inventory Purchases

To ensure that the Division adequately monitors purchases with federal funds, Providers **MUST record ALL** items with **a unit cost of $1,000 and above.**

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Equipment Inventory Guidelines

The following elements are required on the inventory of all equipment purchased.

- Description of Property

- Serial Number/ID Number

- The source of the funding

- Title Holder

- Acquisition Date

- Cost of Property

2 C.F.R. 200, Uniform Grant Guidance, 200.313 Equipment: Property records must be maintained that include:

- Percentage of Federal Participation

- Location of Property

- Use and Condition of Property

- Sale Price

- Date of Disposal

Equipment Inventory List Example

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		
3/21/19	Elec. Countertop Fryer	1142120	HDC-CX250	Tag# 8	$1,593.59	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New			

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Records Request:

Please upload the below document to the ShareFile by **September 1, 2022:**

- List of administrative staff with duties relevant to these grants. Include location and contact numbers.

- List of instructors (including position title) paid by the grants and their assigned schedule and location.

- Location of all (CTE) programs, including address with zip codes, phone number, and dean or director name.

- Provide an inventory of equipment purchased with the Carl D. Perkins grant funds, by site and with the required elements of the Education Department General Administrative Regulations (EDGAR) for grant awards issued 2019-20 through the current fiscal year.

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Examples of Monitoring Findings

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Example of Monitoring Findings

Procurement findings: Authority/Law: 2 CFR 200.320 Methods of procurement to be followed, 34 CFR 80.36(b) – Procurement Standards

- Lack of policies and procedures for contracting and/or purchasing goods and services.

- Not using a **cost and price analysis** for all procurements in **excess** of the Simplified Acquisition Threshold (small purchases) including modifications.

- Not documenting all independent estimate of costs before receiving bids or proposals.

Example of Monitoring Findings

Financial Finding: Authority/Law: 2CFR 200.407 Prior written approval; Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B "Project Amendments."

- Unauthorized purchases made against the federal grant.

- Spending federal grant dollars **prior** to approval of requested grant amendments.

- Spending federal grant dollars **WITHOUT** approval of requested grant amendments.

- No submission of a budget amendment.

Tool: Grant Budget Analysis

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		($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)		$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	

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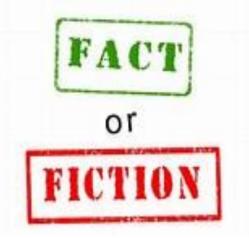
Tool: Grant Budget Analysis

Understanding the Grant Budget Analysis:

- All expenditures must have prior approval.

- DCAE-administered programs do not allow 10% variance.

- Funds can only be spent on approved programs (Perkins V Sect 134).

- If applicable, expenditure justification will be required.

Example of Monitoring Findings

Data and Assessment: Authority/Law: Failure to accurately report student data to FDOE: UGG 2 CFR 200.328 Monitoring and reporting program performance, F.S. 1008.43 Career program reporting requirements.

- Student performance data submitted was incorrect.

Property control and inventory findings: Authority/Law: 2 C.F.R. 200, Uniform Grant Guidance, 200.313 Equipment and EDGAR, Section 80.32 Equipment, (d)(1).

- Failure to maintain all required elements
- Undocumented disposal of equipment

General Concerns
&
Best Practices

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CAREER AND ADULT EDUCATION

General Concerns

- Last minute spending…students must benefit.

- No staff development plans.

- No leadership succession plans.

- Lack of coordination among MIS/data, program and financial Professionals.

- Outdated policies and procedures.

- Lack of attention to off-site location resource needs.

- Incomplete MOU and contract service agreements.
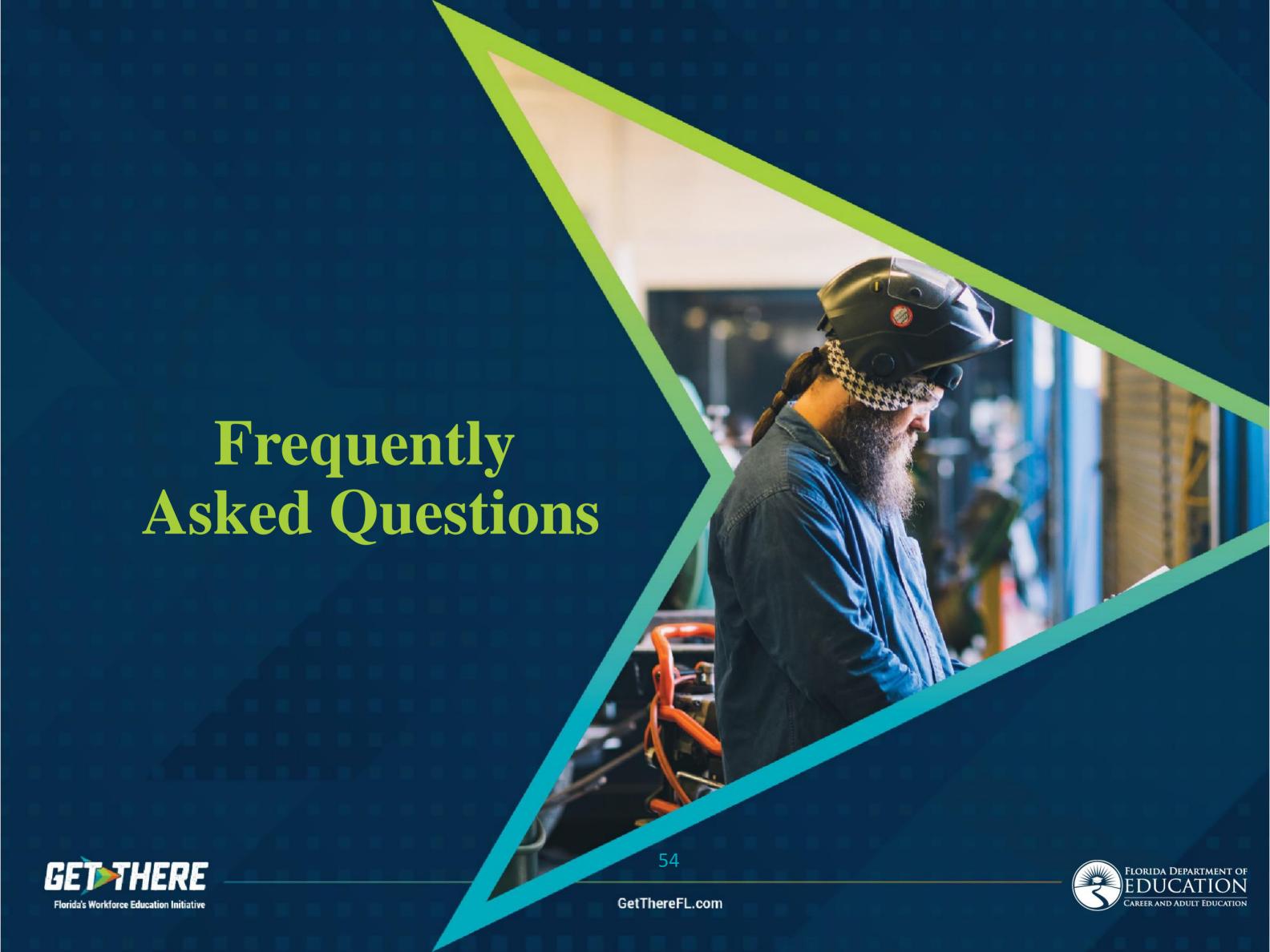
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Best Practices

- Innovative uses of technology.

- Continued collaboration with business and industry.

- Integration of academics with career themed curriculum.

- Effective use of advisory boards.

- Effective communication between administrative, program and support staff .

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Frequently Asked Questions

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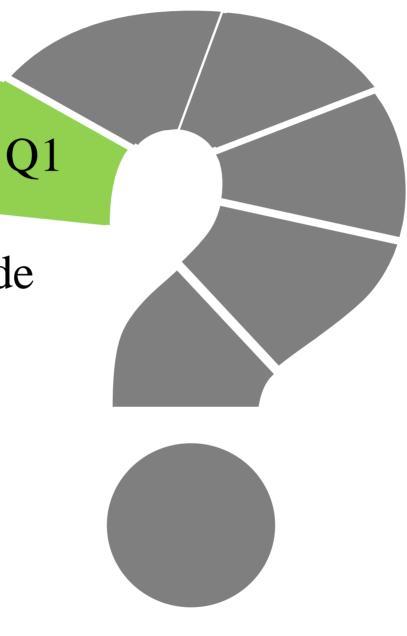CAREER AND ADULT EDUCATION

Frequently Asked Questions

Q1. Who should we include for the entrance/exit meetings and interview sessions?

A. Any Personnel that may need to be addressed during the monitoring week is preferred, but it's up to the provider.

Frequently Asked Questions

Q2. Are we still required to upload documentation once our actual monitoring week has concluded?

A. Ultimately, all documents should be uploaded or reviewed by the exit meeting.

Frequently Asked Questions

Q3. What if I have both secondary and post-secondary CTE programs? Will both program areas be monitored?

Q3

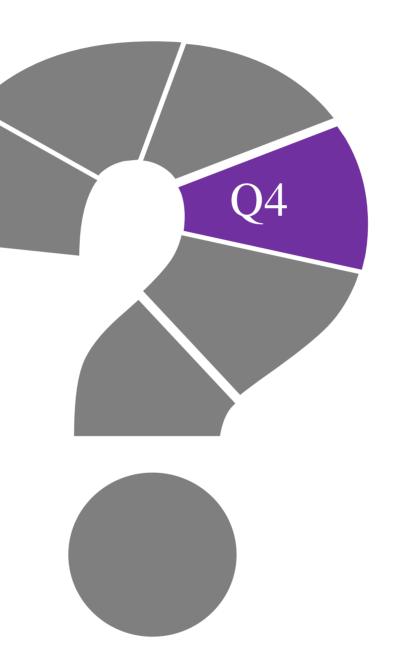A. The Compliance team is required to monitor **ALL** grants that pass through the Division of Career and Adult Education.

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Frequently Asked Questions

Q4. If I have documentation/evidence that is applicable to multiple questions, do I need to upload it more than one time?
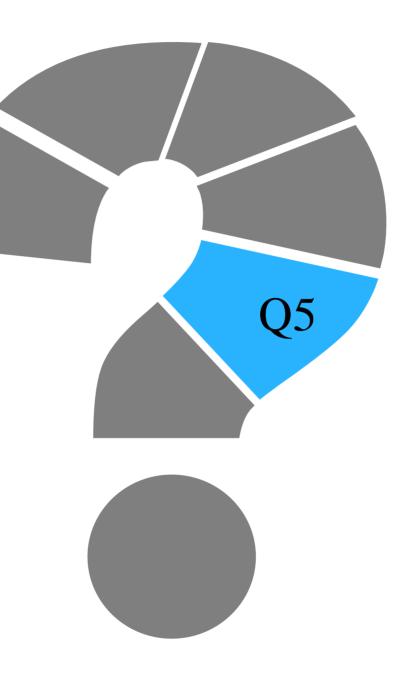
Q4

A. No, briefly write in the note section of the objective informing the Lead Reviewer the location.

Frequently Asked Questions

Q5. Is it required for all documentation to be uploaded to the ShareFile prior to their monitoring week?

Q5

A. Not required but strongly encouraged..

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Frequently Asked Questions

Q6. Are the three interview sessions (CTE, AE, data and assessment) the only time you will need to speak directly to administrative and program staff?

Q6

A. In general, yes, but sometime additional questions may surface.

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Frequently Asked Questions

Q7. What happens if we are issued a finding over the course of the monitoring period?

A. Corrective Action Plan will be outlined to rectify the finding.

Q7

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New Questions

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THANK YOU!

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DIRECTOR OF QUALITY ASSURANCE AND COMPLIANCE	**PROGRAM SPECIALIST**	**PROGRAM SPECIALIST**

Dr. Kevin O'Farrell, Chancellor
Division of Career and Adult Education

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