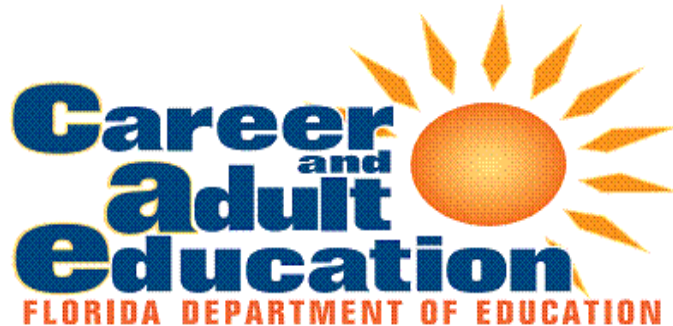


Florida Department of Education
Division of Career and Adult Education

2014-15 Quality Assurance Policies, Procedures and Protocols



<http://www.fldoe.org/workforce/compliance.asp>

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

SECTION 1 - GENERAL PROVISIONS

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

A WAY OF WORK

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

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

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, the Office of Management and Budget (OMB) circulars, and/or conditions of the grant(s). The timely identification of non-compliance provides a framework to make changes that are expected to result in programs becoming more efficient and effective. Addressing the providers' program performance is essential to the Division's accountability system. A comprehensive and multi-dimensional Quality Assurance System is a foundation for continuous improvement of services and systems both internally and externally. Our commitment to excellence supports accountability, collaboration, targeted technical assistance, continuous improvement, and positive systemic change.

AUTHORITY

The Florida Department of Education receives federal funding from the United States Department of Education for Adult Education and Family Literacy under the Adult Education and Family Literacy Act of 1998 and for Career and Technical Education (CTE) under the Carl D. Perkins Career and Technical Education Act of 2006. FLDOE awards sub grants to eligible providers to administer local programs. FLDOE must monitor providers to ensure compliance with federal requirements, including Florida's approved state plans for Career and Adult Education, as specified in 34 CFR 76.770, 34 CFR 80.40 of the Education Department General Administrative Regulations (EDGAR), OMB Circular A-133, §___400, and §215.86, Florida Statutes.

Part 74 - Administration of grants and agreements with institutions of higher education, hospitals, and other non-profit organizations. §74.1 Purpose (a) this part establishes uniform administrative requirements for federal grants agreements awarded to institutions of higher education, hospitals and other non-profit organization.

(d) Non-profit organizations that implement federal programs for the states are also subject to the state requirements. (Authority: 20 U.S.C. 1221e-3, 3474; OMB Circular A-110)

Part 76 - State Administered Programs. 34 CFR 76.1 "Programs to which part 76 applies.

(a) The regulations in part 76 apply to each State-administered program of the Department."

34 CFR 76.770 "A State shall have procedures to ensure compliance. Each State shall have procedures for reviewing and approving applications for sub grants and amendments to those applications, for providing technical assistance, for evaluating projects, and for performing other administrative responsibilities the State has determined are necessary to ensure compliance with applicable statutes and regulations."

Part 80 - Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments, 34 CFR 80.1 "Purpose and scope of this part. This part establishes uniform administrative rules for federal grants and cooperative agreements and sub awards to State, local and Indian tribal agreements."

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

OMB Circular A-133 - Subpart D--Federal Agencies and Pass-Through Entities, §____.400 Responsibilities. "(d) Pass-through entity responsibilities. A pass-through entity shall perform the following for the Federal awards it makes: (3) Monitor the activities of sub recipients as necessary to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved."

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

§1008.32, F.S., addresses the responsibility of the State Board of Education for oversight and enforcement relative to compliance.

Title VI of the Civil Rights Act of 1964 [PL. 88-352]; Title IX of the Education Amendments of 1972 as amended [20 U.S.C. 1681-1683 and 1685-1686]; Section 504 of the Rehabilitative Act of 1973, as amended [29 U.S.C. 794]; Section 1000.05, Florida Statutes: "The Florida Educational Equity Act"; Section 760.10, Florida Statutes: "Unlawful Employment Practices" Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act of 1990, Age Discrimination in Employment Act of 1967 and the Age Discrimination Act of 1972. The Genetic Information Nondiscrimination Act (GINA) of 2008 prohibits discrimination on the basis of genetic information.

Civil right compliance obligations are monitored by the following:

Secondary and technical education centers operated by public school districts: The Office of Equal Educational Opportunity (OEEO); contact phone number: 850-245-9556 or for Postsecondary public education institutions: Equity and Civil Rights Compliance, Division of Florida Colleges; contact phone number: 850-245-9468. Should you have any questions or concerns, please contact the OEEO at 850-245-9556 or the OECC at 850-245-9468.

The Project Application and Amendment Procedures for Federal and State Programs (Green Book at <http://www.fldoe.org/comptroller/gbook.asp>)

Financial and Program Cost Accounting and Reporting for Florida Schools (Red Book at <http://www.fldoe.org/fejp/redtoc.asp>)

STRATEGIC IMPERATIVE

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

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

OPERATIONAL STANDARDS – ROLES AND RESPONSIBILITIES

The Office of Management and Budget (OMB) Circular A-133 requires that the FDOE, Division of Career and Adult Education, monitor the activities of sub-grantees or providers, to ensure that performance goals are achieved and federal funds are expended for authorized purposes. Monitoring will support compliance with federal laws and regulations, state statutes and rules, and the provisions of an approved grant award. A Quality Assurance System includes various monitoring strategies such as: phone calls, emails, conference calls, video conferences, grant application reviews, self-assessment, self-monitoring activities, records reviews, targeted technical assistance, corrective action plans, onsite visits, verification and/or referrals for fiscal or data reviews.

Quality Assurance staff is expected to coordinate and complete compliance and performance monitoring in accordance with the system requirements. Staff is required to render impartial and unbiased judgments in the review of provider performance and compliance with the terms and conditions specified in the approved grant award, as well as applicable state and federal laws.

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

SECTION 2 - IMPLEMENTATION FUNDAMENTALS

Purpose: The purpose of this section is to identify essential fundamentals of the implementation of the Quality Assurance System.

GENERAL PROCEDURES

A framework has been developed to provide consistency and order to the application of the Quality Assurance activities as they are developed. For each component of the framework certain elements may be present.

Purpose: A statement of purpose will provide clarity regarding the goal of the specific component or monitoring activity.

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

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

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

STAKEHOLDER INVOLVEMENT

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

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

Focus Groups: Representatives associated with the grant awards as a provider, student or family member, may be solicited from across the state to participate in periodic focus groups during the year. The focus groups may give input regarding a single issue/topic. Groups may be contacted for phone or video conferences, individual calls, emails, or written surveys. Focus groups may also be organized to meet during onsite visits.

Peer Monitors: Peer monitors can be an invaluable asset to the quality assurance process, especially monitoring. Persons from the field who are nominated to participate in the monitoring process and bring a wealth of training and expertise to their assignment. Peer monitors may be used across disciplines and can be a key tool in times of shrinking resources. Qualified persons from local providers, FDOE, and/or outside agencies may be recruited to participate in the monitoring processes with the FDOE monitoring team. Use of peer monitors will increase monitoring resources, provide training on the monitoring process, and support an effective and efficient system. The division may implement a peer monitoring system.

PROFESSIONAL DEVELOPMENT

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

Targeted providers designated to have an onsite visit, will receive training via conference call regarding the monitoring activities and procedures specific to the visit.

SECTION 3 - PROVIDER SELECTION

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

Various sources of data are used throughout the implementation of the Quality Assurance System. 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 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 strategy (ies) to be implemented.

Those agencies with high Risk Assessment scores will be monitored onsite, with consideration of the resources available. Unique circumstances may contribute to the addition or postponement of onsite monitoring for some agencies. Any monitoring strategy may be utilized up to and including, onsite monitoring, if determined necessary by the director, requested by other administrative staff, or directed by the chancellor; such monitoring activity may be announced or unannounced. Additional agencies may be required to complete a self-assessment and/or be subject to a desk review except under extraordinary circumstances or determined necessary by the director. Those agencies that were either monitored onsite or completed a self-assessment during a given year may not be subject to the same activity in two subsequent years. However, there are those agencies whose size may dictate monitoring by regions or geographic areas during successive years, such arrangements will be made with the individual provider.

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

DATA REVIEW

The level of compliance and performance of services delivered by each provider requires continuous monitoring. Data is a key accountability tool used to measure past and present performance. The review of data is an integral part of the activities which will support the appropriate monitoring strategy for selected service providers. Following are some of the data sources that may be used to assess a provider's performance:

- Grant Application including Assurances
- Project Disbursement Report (DOE 499 and 399)
- Project Amendment Request(s)
- Auditor General Audit Reports
- Community-Based Organizations' (CBO) Audit Reports
- National Reporting System (NRS) - Adult Education Annual Report
- Florida Education Training and Placement Information Program (FETPIP)
- Workforce Development Information System (WDIS)
- Consolidated Annual Report (CAR)-Career and Technical Education Annual Report
- CBO data system

LEADERSHIP CONTRACTS

Contracts that promote and support the providers of career and technical education and adult education programs to enhance student performance will be monitored. Once targeted, districts or colleges are identified for onsite monitoring such support contracts may be included in scheduled activities.

Should additional protocols be developed specific to these agencies, such protocols would be distributed prior to any monitoring activity. Alternative schedules may also be implemented. Such contracts include, but are not limited to, leadership grants, associations, and CTSO's.

SECTION 4 - RISK ASSESSMENT

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

Risk Assessment is a process used to evaluate variables associated with the grants by assigning a rating for the level of risk to the Florida Department of Education and the Division of Career and Adult Education.

Risk Factors

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

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

Risk Matrix

The risk assessment tool, the Risk Matrix, uses predetermined risk factors to rank career and adult education grants and thus, identify targeted providers.

- Specific risk factors are identified on the Risk Matrix;
- A scale of specific criteria is established;
- A value is assigned for each of the criteria;
- The value is multiplied by the risk factor weight;
- Results in a total number of points for the specific risk factor; and

- The points for each risk factor are totaled for a level of risk score for the agency.

The higher score indicates a greater level of risk. However, **A HIGH RISK ASSESSMENT SCORE SHOULD NEVER BE INTERPRETED AS A NEGATIVE REFLECTION ON THE PROVIDER.**

The division will review specific risk factors, criteria scale, values and risk factor weights annually and make appropriate changes as needed.

Linking the Risk Assessment and the Monitoring Strategy

The Risk Assessment process is used by the Quality Assurance team to determine the monitoring strategy, appropriate for each provider, with the more comprehensive strategy, for example, an onsite visit for a provider deemed to be at higher risk. Once an agency is linked to a specific monitoring strategy, then consideration of the current status of all career and technical and adult education funded grants in the geographic area may be reviewed.

The review of the Risk Assessment process will be ongoing. Use of the Risk Assessment process does not limit the division's ability to monitor any agency grant award, or other contracts at any time. The division may apply any specific monitoring strategy to any federal- or state-funded provider at any time. There may be circumstances which may warrant onsite monitoring or other strategies regardless of a provider's risk matrix score. Although the Risk Assessment process is the primary means by which monitoring strategies are determined, it is not the only method that may be used. For example, to ensure the effective and efficient use of resources, there may be opportunities to evaluate and monitor other career and technical and adult education grants, agencies or programs in the geographical area at the same time that targeted providers are monitored.

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SECTION 1 - MONITORING STRATEGIES

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

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

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

Video Conference Various technologies may be used to conduct a video conference to complete monitoring activities including, but not limited to, pre-visit and post-visit communication with the agency, interviews, targeted technical assistance, and follow-up activities.

Self-Assessment An agency completes a full or partial Self-Assessment according to a timeline determined by the Quality Assurance Director to identify areas of greatest need/non-compliance; provide the results to the Division; and, if necessary, develop a corrective action/system improvement plan to ensure full compliance.

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

Technical Assistance The Division of Career and Adult Education or other designated parties provide a set of services that will assist providers with program and fiscal accountability, program quality and management, policies and procedure, or operations.

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

Verification Activities are used to ensure the accuracy and consistency of the agency's performance, documentation, policies and procedures or data. Verification activities may take place onsite or offsite.

Desk Review An agency's programs and services are monitored by various strategies including, but not limited to, a review of the agency's grant implementation and supporting documentation, requested records, and phone interviews.

Program Improvement Plans/Action Plans/Corrective Action Plans (CAPs) Activities/strategies are developed by the provider and/or Career and Adult Education to achieve program, data, and/or system improvement or compliance.

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

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

SECTION 2 - MONITORING PROCESSES

Purpose: Compliance and performance monitoring provides the Department with information necessary to assess the fiscal and programmatic accountability of its providers. This section outlines the expectations for, and activities of, compliance monitoring. Activities may take place onsite or offsite.

COMPLIANCE AND PERFORMANCE MONITORING IMPLEMENTATION

Major Activities

The following activities may be included as part of the monitoring process:

- Communication and Notification
- Interviews: administrative, support, instructors, students and families
- Observations: classroom instruction, campus and events
- Records review: administrative, program, personnel, financial
- Data verification
- Desk-top reviews
- Self-Assessment
- Student case studies
- Surveys
- Reporting
- Targeted Technical Assistance
- Development and Review of Corrective Action/Action Plans/Program Improvement Plans
- Verification and Closure

COMMUNICATION

In order to ensure consistent communication between the FDOE quality assurance team and the individual provider, guidelines for the communication process are established. By designating specific coordinating personnel for each party and by setting timelines, each party will be informed of the expectations for completing the specific tasks required to implement the monitoring processes effectively. The initial notification letter and final report will be addressed to the provider's Agency Head. All remaining written communications will be directed to the provider's designated contact person(s). Although reference is made to communication regarding onsite visits, similar activities may be incorporated into the offsite monitoring strategies. Any exceptions or issues that arise from a monitoring strategy should be addressed with the director of Quality Assurance and Compliance (Director).

Notification Providers may be notified of a pending monitoring activity by a phone call from the Director within a reasonable time of a scheduled activity. This call will be followed by written notification to the Agency Head. Additional phone calls will be held to coordinate the activity and ensure that the provider is informed of the monitoring components. Electronic mail is considered written notification when used. Unannounced visits may be made at the discretion of the director or chancellor.

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

Designation of Quality Assurance Team Contact The Director is the team leader for all monitoring functions, including onsite visits. A co-leader is designated to coordinate the processes specific to a provider or group of providers. The co-leader reports to the Director.

Quality Assurance Team The Quality Assurance team is the designated group of persons to complete the monitoring processes.

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

Communication Prior to Onsite Monitoring Prior to a monitoring activity, the designated site team leader will conduct a phone interview with the provider-designated contact person(s). The team leader will identify persons involved with the activity with the provider. The provider will have the opportunity to clarify any issues concerning the data used as a basis for determining the site selection. Finally, the agency will be asked to provide any other information regarding its programs, procedures, or geographic area that may influence activities during monitoring process. Additional documents may need to be forwarded to the Quality Assurance section of the division prior to the activity. Training will be provided to targeted providers regarding the monitoring policies, procedures, and protocols.

Entrance Conference The Quality Assurance team conducts an entrance conference with the provider's official representative(s). The provider may invite other persons as appropriate. The agency may provide an overview of its programs, services and systems which operate with the grant funds. The monitoring team describes the activities that will take place. The team leader may request those records covering the monitoring period up to and including the current records and documentation. Individual and/or group interviews, when used, may be set up in advance; however, during the course of the visit any agency personnel may be requested to participate in an interview. The provider is expected to make every effort to ensure that persons to be interviewed are available. The entrance conference provides an opportunity for both parties to review the schedule and work out any logistics that may contribute to an efficient and effective visit. This time also provides an opportunity for some general discussion among the quality assurance team and the provider's representatives.

Onsite Visits to Specific Locations The format of the onsite visit at a specific location may vary depending on size of location and programs available. Oftentimes at schools and college campuses with multiple programs, we meet with the administrator and other available personnel (i.e. CTE/AE directors, coordinators, guidance counselors, program specialists, department heads, teachers, etc.) to hear briefly about the programs offered (30-45 minutes). When possible, we meet with a group of students participating in the programs (8-10 students for 20-30 minutes). Finally, we observe classrooms and conduct records reviews (45-60 minutes). For evening programs we usually introduce ourselves to the director/coordinator/instructor of the program and proceed to visit classrooms and with students (usually 30-45 minutes for total visit).

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

Exit Conference Upon the conclusion of the monitoring activity, an exit conference is held. In attendance are members of the Quality Assurance team and the provider's designated participants. The provider may invite other persons as appropriate. The purpose of the meeting is to exchange information about the provider's strengths and concerns and to report on the general results of the monitoring visit. The exit conference allows the persons present an opportunity to review and discuss any issues addressed during the course of the monitoring activity. Conference calls may be used to facilitate an exit conference. Requests for additional time to submit documentation following the exit conference must be approved by the director.

Follow-up Activities The quality assurance staff is required to work with the provider to develop and ensure that the Resolution Plan is comprehensive, timely, and completed. Onsite visits or further requests for documentation may be implemented to insure full compliance.

SECTION 3 - SELF-ASSESSMENT

Purpose: The purpose of the Self-Assessment is to enable providers to conduct a self-review to determine the level of compliance in place for each of the grants administered by the agency. The completion of a Self-Assessment may also be used as a monitoring strategy, thus, directed by the Bureau of Grants Administration and Compliance.

SELF-ASSESSMENT PROTOCOLS

The administration of the Self-Assessment tool is a monitoring strategy that may be used voluntarily or as directed by the division. Providers may independently choose to apply various protocols on a regular or intermittent basis to ensure continuous compliance with the applicable federal law, regulations, OMB circulars, state statute and rules. The protocols that may be used as a Self-Assessment tool include designated protocols contained in this document.

Requirements Periodically, the division may designate certain agencies to complete specific protocols as a Self-Assessment tool, depending on the level of risk indicated in the Risk Assessment process. The division may require a Self-Assessment at any time; providers will be given a specific timeline to complete the Self-Assessment. All Self-Assessments must be signed by the agency head. Once completed by the provider, the results are forwarded to the division for review. Documentation verifying compliance may be requested of the provider by monitoring staff. Providers are expected to submit requested documents within the specified timelines.

Verification Activities to verify the accuracy of the data submitted to the division may be completed at any time by the bureau.

SECTION 4 - RESOLUTION ACTIVITIES

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

CORRECTIVE ACTION PLAN

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

ACTION PLAN

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

PROGRAM IMPROVEMENT PLAN

When a provider is unable to meet the projected level of performance on specific indicators, a Program Improvement Plan may be required. Should program areas already require a plan, duplication is not required. The purpose of the plan is to target specific indicators for improvement.

Quality Assurance staff may work in concert with other division staff to ensure consistency with the requirements, review, approval and follow-up of Program Improvement Plans.

Components of Plans

One form is used for all plans. The following components shall be included in each plan:

- A statement of the finding/data/concern
- Action(s) by the provider to address the finding/data/concern and ensure full resolution
- Person(s) responsible for implementation of the strategies
- Projected date of completion, if warranted
- Technical assistance needed or provided

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

TARGETED TECHNICAL ASSISTANCE

Non-Compliance As areas of non-compliance are identified locally or across the state, targeted technical assistance may be provided to support full compliance and systemic change for program improvement.

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

Use of Technology A myriad of delivery modalities are appropriate, including, but not limited to: telephone calls, emails, conference calls, PowerPoint presentations and technical assistance papers.

SECTION 5 – ENFORCEMENT AND EVALUATION

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

ENFORCEMENT ACTIVITIES

- Communication with Agency Heads and/or Governing Boards: Communication with governing boards may be required to focus on the need for immediate and systemic change to continue eligibility for grant.
- Regular Monitoring/Reporting: For a designated period of time, the provider's activities will be monitored on a regular basis; provider may be required to submit regular and frequent reports.
- Grant Conditions: Restriction(s) may be placed on a specific grant as a result of monitoring activities; conditions may include such actions as directed activities, structured spending and increased reporting.

- Funding Strategies: Actions taken in regard to the selected provider's funding may include a range of interventions from directed funding, change in method of reimbursement, or to delay or withhold funds.
- State Plans: The State Plans may address additional enforcement activities.
- General Assurances, Terms, and Conditions for Participation in Federal and State Programs: This document must be signed by all agencies and organizations that receive federal or state funds, and may address enforcement activities.
- 34 CFR 80.51: This section of EDGAR addresses enforcement activities which may be applied to certain grants.

INVESTIGATIONS

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

CLOSEOUTS

Providers may be required to submit final reports upon the conclusion or termination of a grant. The Closeout Review Process may address performance and financial reports, inventory and disposition of equipment, record retention and/or additional elements requested by the department 34 CFR 80.50.

EVALUATION SYSTEM

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

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

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

Module C

SECTION 1 GRANT IMPLEMENTATION.....17

MODULE C SECTION 1 – GRANT IMPLEMENTATION

Provider:	Location:	Date:	Monitor:
Position Interviewed:			
	1. Who determines if a grant purchase is reasonable, allocable and allowable?		
	2. If you are not the grant manager, who is the grant manager?		
	3. How do you verify completed contractual deliverables (when applicable)?		
	4. How do you track the flow of federal funds as it applies to the operation of a program?		
	5. How do you assure that grant dollars are spent efficiently throughout the year to minimize grant balances at the end of the year?		
Comments:			

Module D

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SECTION 1 - PERFORMANCE INDICATORS

Key Performance Indicators – Adult Education

Performance Outcomes

Providers are ranked on the level of achievement on performance indicators specific to the programs of Adult Education and Family Literacy and the data available.

Adult Education and Family Literacy

The Adult Education and Family Literacy Act of 1998 (AEFLA) requires that state and local program administrators establish a comprehensive accountability system to assess the effectiveness of eligible agencies (state departments of education) in achieving continuous improvement of adult education and literacy activities. The performance accountability system also assists in verifying the return on investment of the Federal funds in adult education and family literacy activities. AEFLA mandates that each eligible agency must, at a minimum, use all three of the primary core indicators listed below. However, each eligible agency may establish additional core indicators of performance that it may wish to track in the administration and delivery of its programs.

Each eligible agency must establish levels of performance for each of the core indicators of performance which, at a minimum, are expressed in objective, quantifiable, and measurable form and show the progress of the eligible agency toward continuously improving performance. These levels of performance are identified in the State Plan. The eligible agency and the secretary of education must reach an agreement on these identified levels of performance, and the eligible agency must annually prepare and submit to the secretary of education a report outlining its progress in achieving the agreed-upon levels of performance. In addition, the eligible agency and local eligible providers negotiate levels of performance (and rates of reimbursement for performance) during the request for proposal (RFP) approval process.

Florida has adopted State Completion Goals (SCG) for each Educational Functioning Level (EFL), except for Adult Secondary Education (ASE) High School, for the next five years. Local performance goals will be expressed in percentage and numerical form. Recipients are expected to meet the goals or demonstrate improvement. Achieving Florida's Adult Education State Completion Goals will be based on each recipient's accurate data submission of EFL for enrolled students as reported in the National Reporting System (NRS) Table 4, Column D.

If recipients fail to achieve State Completion Goals for each EFL or demonstrate improvement from the previous year, the recipient may be required to develop and implement an Adult Education Program Improvement Plan (AEP/IP) during the second year of funding.

Primary Core Indicators

- Demonstrated improvements in literacy skill levels in reading, writing, and speaking the English language, numeracy, problem solving, English language acquisition, and other literacy skills
- Placement in, retention in, or completion of postsecondary education, training, or unsubsidized employment
- Attainment of a secondary diploma or its recognized equivalent

SECTION 2 - ASSESSMENT PROTOCOL

Provider:	Date:	Position Interviewed:	DOE Monitor:
Relevant sections of law and regulation: section 212 of AEFLA (Pub. L. 105-220), 34 CFR Part 462, Subpart D; and 34 CFR 76.770, 80.40 and 80.43; also see the current Adult Education Assessment Technical Assistance Paper			
Discuss your intake and placement process for new students. <ul style="list-style-type: none"> • Are students being placed within a program of instruction based on the lowest score obtained by the student in the respective skill area of the standardized assessment? • Does your agency use the National Reporting System (NRS) Test Benchmarks for Educational Functional Levels (EFLs) Table, with the scale scores of each test, when placing students into programs and reporting student gains? 			
Assessments <ul style="list-style-type: none"> • What standardized assessment instrument(s) does your agency use to pre- and post- test Adult Basic Education (ABE) students? • Do you have a procedure to ensure that students registered in a course are pre-tested with a state-approved assessment within the first 12 hours of instructional activity? • What standardized assessment instrument(s) does your agency use to pre- and post- test Adult English for Speakers of Other Languages (ESOL) or English Literacy and Civics (EL/Civics) students? • Is there a procedure to use an alternative assessment instrument for placement of a student with disabilities if the standard assessment instruments do not accurately measure the student's ability? If so, what instrument(s) is (are) used for this purpose? • Does your program follow the test administration guidelines in each Test Administration Manual furnished by the assessment's publisher, including timed testing? • Are your testing administrators certified, if required? 			
Accommodations <ul style="list-style-type: none"> • Is there a procedure for self-identification of disabilities and to provide accommodations for students with disabilities or other special needs who need to take assessments? • What documentation do you require or accept for accommodations? • What types of accommodations have been provided in your classes? • Are accommodations ever refused? Why? 			
Test Materials and Security <ul style="list-style-type: none"> • Are all test materials, including passwords, kept in a secure, locked storage before and after the administration of any assessment? • Is there a procedure for documenting test security compromise incidents? If so, who should these incidents be reported to? • Is there a procedure for the disposal of obsolete, damaged and outdated assessment materials that will ensure the security of the assessment materials? • Are all tests precisely accounted for and written documentation kept for each test? 			
Comments:			

State Approved Assessment Instruments

Provider:	Date:	Position Interviewed:	DOE Monitor:
DIRECTIONS: Identify which of the following state-approved standardized assessment instruments are used and administered by the agency.			
Assessment Instruments	Agency administrators		
Basic English Skills Test (BEST) Literacy or BEST Plus	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Brigance Employability Skills	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Brigance Life Skills	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comprehensive Adult Student Assessment System (CASAS)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Comprehensive Test of Adaptive Behaviors (CTAB)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
GED Test	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Kaufman Functional Adult Student Assessment System (K-FAST)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
TABE Comprehensive Language Assessment System- English (TABE CLAS-E)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Tests of Adult Basic Education (TABE)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Life and Work Series (ELCATE and Adult ESOL Students)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
General Assessment of Instructional Needs (GAIN)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Other- list _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

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

Administration of Standardized Assessment Instruments

Provider:	Date:	Position Interviewed:	DOE Monitor:
BEST Assessment Instruments			
1. If BEST Literacy is used, is this a timed assessment?			
2. Are persons who administer BEST Plus required to complete a one-day workshop and 20 practice administrations before they administer this instrument?			
CASAS Assessment Instruments			
1. Does the agency administer an oral screening form as part of the intake process before placement into the appropriate ESOL program?			
2. When selecting the appropriate instructional level for the student, is the level based on the lower of the two scores?			
3. Are pre- and post-tests given using the same skill area (reading, listening, writing, or math)?			
4. Are both reading and listening skills assessments being used for placement and progression of ESOL students?			
5. Do you have a procedure that provides for a CASAS post-test after a minimum number of hours of instruction? If so what is the procedure?			
TABE Assessment Instruments			
1. Which adult education students are assessed using this instrument?			
2. Have persons administering this testing received training sponsored by FDOE and CTB McGraw-Hill, with a certification that they completed training? If so, request a copy of a certification for a person who has recently completed the certification training.			
3. What refresher training, if any, do persons administering this instrument receive?			
4. Does your agency use TABE Forms 9 and 10?			
5. Does your agency use the TABE locator to determine placement in the appropriate level before administering the TABE full battery or survey for the TABE pre-test?			
6. Does your agency give the same level of TABE to all students?			
7. What procedures, if any, exist to determine when a post-test is administered?			
8. Are students retested before they are placed into an EFL when there has been a break in instruction of greater than a year?			

Assessment Records Review

Provider:	Date:	Position Interviewed:	DOE Monitor:
CASAS Instruments			
Initials/NA	Document/Process	Comments	
	CASAS – For ESOL students, oral screening form is administered for students with limited English proficiency (English Language Learners) before placement into the appropriate ESOL program		
	CASAS - Post-tests are given using the same level as the pre-test, with an alternate form, or at a higher level, depending on pre-test scores		
	CASAS - Pre- and post-tests are given using the same skill area (reading, listening, writing, or math)		
	CASAS - Reading skills assessments are being used for placement and progression of ESOL students. <i>(The listening skills assessment is used for guiding instruction only.)</i>		
TABE			
Initials/NA	Document/Process	Comments	
	TABE - TABE locator is used and the proper level of TABE (E, M, D, or A) is used based on locator results		
	TABE- Different versions of TABE are used if student is tested twice within six (6) months		
	TABE- Use of TABE Forms 9 and 10		
QUALIFICATIONS of persons administering standardized assessment instruments			
Initials/NA	Document/Process	Comments	
	List of agency persons administering TABE - randomly check list for certification(s) for completion of TABE training sponsored by FDOE and McGraw Hill.		
	List of agency persons administering TABE - randomly check list for certification(s) for completion of TABE refresher training sponsored by FDOE and McGraw Hill within two years of the initial training and every two years after that to present.		
	List of agency persons administering BEST Plus - randomly check for completion of one day BEST Plus workshop.		

SECTION 3 – ADULT EDUCATION PROTOCOL

	Provider:	Date:	Position Interviewed:	Monitor:
	Grants and Contracts for Eligible Providers			
	Statutory Authority: Adult Education and Family Literacy Act (AEFLA), Section 231(a)-(e)			
	Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.			
	Grants and Contracts			
	1. How do funds made available to the agency under the AEFLA enable it to develop, implement, and improve Adult Education and Literacy activities?			
	Required Local Activities (Some of these may be answered using the grant application.)			
	1. Which of the following services do you provide? <ol style="list-style-type: none"> a. Adult Education and Literacy services, including workplace literacy services? b. Family literacy services? c. English literacy programs? 2. Describe the agency's program(s) and services.			
	Special Rule			
	1. How does the agency verify that the adult education or English literacy students: <ol style="list-style-type: none"> a. Have attained 16 years of age? b. Are not enrolled or required to be enrolled in secondary school under state law? and who: c. Lack sufficient mastery of basic educational skills to enable them to function effectively in society? d. Do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education? e. Are unable to speak, read, or write the English language? 2. Does the agency use funding under this Act to provide family literacy programs, services, or activities for eligible students and their families?			
	Considerations			
	1. Measurable Goals <ul style="list-style-type: none"> • The degree to which the eligible provider will establish measurable goals for participant outcomes. 			

	<p>2. Past Effectiveness</p> <ul style="list-style-type: none"> • Is the agency successful in meeting or exceeding performance measures (especially with respect to those adults with the lowest levels of literacy) as identified in the grant?
	<p>3. Serving Those Most in Need</p> <ul style="list-style-type: none"> • How does the agency ensure that it is serving individuals in the community who are most in need of literacy services, including individuals who are low-income or have minimal literacy skills?
	<p>4. Intensity of Services</p> <ul style="list-style-type: none"> • How does the agency ensure that its program is of sufficient intensity and duration for participants to achieve substantial learning gains? • Where and how often do classes meet? For how long? • Where are classes located: schools, libraries, churches, community centers? <p>5. Effective Practices</p> <ul style="list-style-type: none"> • Does the program use instructional practices that research has proven to be effective in teaching individuals to read? • Are activities built on a strong foundation of research and effective educational practice? <p>6. Use of Technology</p> <ul style="list-style-type: none"> • How do the activities effectively use advances in technology, as appropriate, including the use of computers? <p>7. Real-Life Context</p> <ul style="list-style-type: none"> • How do the activities provide learning in real-life contexts to ensure that an individual has the skills needed to compete in the workplace and exercise the rights and responsibilities of citizenship? <p>8. Staffing</p> <ul style="list-style-type: none"> • Are the activities staffed by well-trained instructors, counselors, and administrators? <p>9. Coordination</p> <ul style="list-style-type: none"> • How do the activities coordinate with other available resources in the community, such as by establishing strong links with elementary and secondary schools, postsecondary educational institutions, one-stop centers, job training programs, social services agencies, businesses and employers?
	<p>10. Flexible Schedules</p> <ul style="list-style-type: none"> • How does the agency offer flexible schedules and support services (such as child care and transportation) that are necessary to enable individuals, including those with disabilities or other special needs, to attend and complete programs? <p>11. Management Information</p> <ul style="list-style-type: none"> • Does the program maintain a high-quality information management system that has the capacity to report participant outcomes and to monitor program performance against the eligible agency's performance measures?

	<p>12. English Literacy</p> <ul style="list-style-type: none"> • Do the local communities have a demonstrated need for additional English literacy programs?
	<p>Local Application</p> <p>Statutory Authority: AEFLA, Section 232</p> <hr/> <p>1. Refer to the DOE 101 budget page(s) from your grant(s) and the Final Disbursement Forms (FA 499s). Did the agency expend funds as budgeted and/or amended?</p> <p>2. Provide a description of any cooperative agreements that the agency has with other agencies, institutions, or organizations for the delivery of Adult Education and Literacy activities.</p>
	<p>Local Administrative Cost Limits</p> <p>Statutory Authority: AEFLA, Section 233</p> <hr/> <p>1. Do total local administrative costs (including planning, administration, personnel development, and interagency coordination) exceed the 5% administrative cap?</p> <ul style="list-style-type: none"> a. If administrative costs exceed five percent, did your agency negotiate with FDOE in order to determine an adequate level of funds to be used for non-instructional purposes?
	<p>Administrative Provisions</p> <p>Statutory Authority: AEFLA, Section 241</p> <hr/> <p>1. How do you ensure that funds made available for Adult Education and Literacy activities are used to supplement and not supplant other State and local public funds expended for Adult Education and Literacy activities?</p>
	<p>Programs for Corrections Education and Other Institutionalized Individuals</p> <p>Statutory Authority: AEFLA, Section 225</p>

1. Did the agency use AEFLA funds available under Section 222(a) (1) for the cost of educational programs for criminal offenders in correctional institutions and for other institutionalized individuals?
 - a. Which of these academic programs were provided?
 - (i) Basic education?
 - (ii) Special education as determined by the eligible agency (FDOE)?
 - (iii) English literacy programs?
 - (iv) Secondary school credit programs?
2. If the agency is using assistance provided under this section to carry out a program for criminal offenders in a correctional institution, how is priority given to serving individuals who are likely to leave the correctional institution within five years of participation in the program?
3. If the agency is serving criminal offenders (any individual who is charged with or convicted of any criminal offense), where are the programs or activities located:
 - a. Prison?
 - b. Jail?
 - c. Reformatory?
 - d. Work farm?
 - e. Detention center?
 - f. Halfway house?
 - g. Community-based rehabilitation center?
 - h. Other?

SECTION 4 – STATE LEADERSHIP ACTIVITIES – ADULT EDUCATION PROTOCOL

Provider:	Date:	Position Interviewed:	Monitor:
State Leadership Activities – In General			
<p>Statutory Authority: AEFLA, Sections 223(a)(1)-(7)</p> <p>Directions: This form applies only to those agencies receiving AEFLA Leadership funding. Each eligible agency (FDOE) shall use funds made available under the Adult Education and Family Literacy Act (AEFLA) section 222(a) (2) for one or more of the following adult education leadership activities. Did your agency use AEFLA Leadership funds to complete any of the following activities? Check yes or no. If the answer is yes, answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation. Monitoring team members may request verification of deliverables and performance.</p>			
Professional Development Programs			
			<input type="checkbox"/> YES
			<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How did your agency use AEFLA Leadership funds to establish or operate professional development programs to improve the quality of instruction? 2. Did professional development include the following: <ol style="list-style-type: none"> a. Phonemic awareness; b. Systematic phonics; c. Fluency; d. Reading comprehension; e. Instruction provided by volunteers; or f. Instruction provided by state or local personnel? 			
Technical Assistance			
			<input type="checkbox"/> YES
			<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How did your agency use AEFLA Leadership funds to provide technical assistance to eligible providers? 2. For what topics/issues was technical assistance provided? 3. Which of the following methods were used: <ol style="list-style-type: none"> a. Phone calls; b. Site visits; c. Emails; d. Presentations; e. Publications; and/or f. Workshops and conferences? 			

	Technology Assistance	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	<ol style="list-style-type: none"> 1. How did your agency use AEFLA Leadership funds to provide technology assistance? 2. Did your agency provide staff training relating to technology? 3. How do you determine if such training improves quality? 		
	Monitoring and Evaluation of Quality and Improvement	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	<ol style="list-style-type: none"> 1. How did your agency use AEFLA Leadership funds to support monitoring and evaluation of activities, including program improvement activities? 		
	Incentives	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	<ol style="list-style-type: none"> 1. How did your agency use AEFLA Leadership funds to provide incentives for: <ol style="list-style-type: none"> a. Program coordination and integration? b. Performance awards? 		
	Developing and Disseminating Curricula	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	<ol style="list-style-type: none"> 1. How did your agency use AEFLA Leadership funds to develop and disseminate curricula? 2. Did this curricula incorporate: <ol style="list-style-type: none"> a. Phonemic awareness; b. Systematic phonics; c. Fluency; and/or d. Reading comprehension? 		
	Coordination with Existing Support Services	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	<ol style="list-style-type: none"> 1. How did your agency use AEFLA Leadership funds to coordinate with existing support services, such as: <ol style="list-style-type: none"> a. Transportation; b. Child care; or c. Other assistance? 2. Did the availability of these support services assist in increasing enrollment and/or completion of adult education and literacy activities? 		
	Integration and Promoting Linkages	<input type="checkbox"/> YES	<input type="checkbox"/> NO

	1. How did your agency use AEFLA Leadership funds to promote integration of literacy instruction and occupational skills training? 2. How did you promote linkages with employers? Give examples.		
	Linkages with Postsecondary Institutions	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	1. How did your agency use AEFLA Leadership funds to promote linkages with a postsecondary program?		
	<p>State Leadership Activities – Collaboration</p> <p>Statutory Authority: AEFLA, Section 223(b)</p> <p>Directions: This section applies only to those agencies receiving AEFLA Leadership funding. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.</p>		
	Collaboration	<input type="checkbox"/> YES	<input type="checkbox"/> NO
	1. In using AEFLA Leadership funds, how did your agency collaborate where possible, and avoid duplication of effort in order to maximize the impact of the activities described above?		

SECTION 5 – ADULT EDUCATION DATA PROTOCOL

	Provider:	Date:	Position Interviewed:	Monitor:
Adult Education Data				
Statutory Authority: Adult Education and Family Literacy Act, Section 212; section 1008.405 F.S.; Rule 6A-6.014, Florida Administrative Code (FAC.)				
Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.				
Data Foundation and Structure				
<ol style="list-style-type: none"> 1. Does your agency have written procedures for collection, verification, analysis, and reporting of student data? 2. What procedures are in place for tracking students following participation in the agency's program(s)? 3. How does your agency use the data that it collects? 4. Are student gains ever measured by a checklist rather than a state-approved assessment instrument? 				
Data Collection and Verification				
<ol style="list-style-type: none"> 1. Does your agency use an electronic management information system (MIS), used by all programs, that has individual student records within a relational database structure? 2. Does your agency have specific staff (positions) with clear responsibility for data collection, data entry, and data verification? What are these staff positions? See a position description. 3. What is the role of the Adult Education director in verification of data? 4. How is student attendance tracked and reported in your data system? 5. How often is data entered into the agency's MIS system? 6. Who has the responsibility of correcting missing and erroneous data reported to you by the state? Is program staff involved in this process? 				
Data Analysis and Reporting				
<ol style="list-style-type: none"> 1. Do you regularly access your agency's data? 2. How is data used for program management and improvement? 3. How do you share data results with your staff? 				
Staff Development				
<ol style="list-style-type: none"> 1. Has agency staff been provided training on general NRS requirements, including assessment policy and procedures? If so, which staff members receive this training? 2. Discuss the type of training provided for specific staff addressing data collection, data entry, and the production and/or interpretation of 				

	reports. 3. Has training been provided on conducting follow-up survey or data matching procedures to your staff? 4. Has agency staff received training on distance education policy and use of proxy hours, if estimated? 5. Which staff members participate in MISATFOR and WEDDAC meetings? (districts and colleges)
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DATA VERIFICATION

DATA - Student Records Review – Adult Education

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

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

Module E

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SECTION 1 - PERFORMANCE INDICATORS

Key Performance Indicators

Career and Technical Education

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

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

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

The Division of Career and Adult Education has developed accountability guidelines and operational procedures for secondary and postsecondary performance measures. These guidelines are reviewed annually and major changes in operational procedures are vetted with Management Information System (MIS) reports coordinators during standing meetings of 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.fldoe.org/workforce/perkins/perkins_resources.asp.

Florida’s 2014-2015 State Performance Targets are as follows:

Secondary Level

- 1S1 Academic Attainment in Reading = 66.83%
- 1S2 Academic Attainment in Math = 87.32%
- 2S1 Technical Skill Attainment = 88%
- 3S1 School Completion = 95.68%
- 4S1 Student Graduation Rates = 84%
- 5S1 Placement = 80.78%
- 6S1 Non-traditional Participation = 32%
- 6S2 Non-traditional Completion = 95.72%

Adult Level (clock hour)

- 1A1 Technical Skill Attainment = 83%
- 2A1 Completion = 59.25%
- 3A1 Student Retention or Transfer = 56.56%
- 4A1 Student Placement = 75.77%
- 5A1 Non-traditional Participation = 12.81%
- 5A2 Non-traditional Completion = 18%

College Level (college credit)

- 1P1 Technical Skill Attainment = 46%
- 2P1 Completion = 49%
- 3P1 Student Retention or Transfer = 70%
- 4P1 Student Placement = 86%
- 5P1 Non-traditional Participation = 28%

5P2 Non-traditional Completion = 22.82%

Program Improvement Plan

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

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

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

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

Section 1111(b) (2) (C) (i) (v) include separate measurable annual objectives for continuous and substantial improvement for each of the following:

- (1) The achievement of all public elementary school and secondary school students.
- (II) The achievement of--
 - (aa) economically disadvantaged students;
 - (bb) students from major racial and ethnic groups;
 - (cc) students with disabilities; and
 - (dd) students with limited English proficiency

SECTION 2 – PERKINS IV PROTOCOL

Local Program Improvement Plan

Statutory Authority: Perkins IV, Section 123(b)

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

1. Was your agency required to develop and implement a Program Improvement Plan?
 - a. Which indicators are addressed in the agency's Program Improvement Plan?
 - b. Describe the special consideration to performance gaps.
 - c. What agencies, individuals and organizations did your agency consult with to develop and/or implement the plan?

See grant application.

2. Are the strategies indicated in the plan measureable?
3. Can the agency verify the implementation of the strategies proposed in the PIP?
4. If no progress has been indicated, what adjustments to the PIP were/will be made?

Note: The grant budget should identify specific expenditures related to performance targets; verify expenditures

An individual protocol, developed prior to the visit will also address the performance improvement plan.

Local Plan for Career and Technical Education Programs

Statutory Authority: Perkins IV, Section 134

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

1. Describe how the CTE programs required under Section 135(b) (required use of funds) will be carried out with funds under this title.
2. Describe how the CTE education activities will be carried out with respect to meeting state and local adjusted levels of performance established under Section 113.

<p>3. Describe how the eligible recipient will:</p> <ul style="list-style-type: none"> a. Offer the appropriate courses of not less than one of the CTE programs of study described in Section 122(c)(1)(A); b. Improve the academic and technical skills of students by strengthening the academic and CTE components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant CTE Programs to ensure learning in (i) the core academic subjects and (ii) career and technical education subjects; c. Provide students with strong experience in, and understanding of, all aspects of an industry; d. Ensure that students who participate in such CTE programs are taught to the same coherent and rigorous content aligned with challenging academic standards as are taught to all other students; and, e. Encourage CTE students at the secondary level to enroll in rigorous and challenging courses in core academic subjects.
<p>4. Describe how the agency's key stakeholders are involved in the development, implementation, and evaluation of CTE programs and how such individuals and entities are effectively informed about and assisted in understanding the requirements of this title including CTE programs of study.</p>
<p>5. Provide assurances that the CTE program is of such <u>size, scope, and quality</u> to bring about improvement in the quality of CTE programs. See Form DOE 900E, provided in the RFA for further delineation of size, scope, and quality for each Program of Study. <i>See Application Narrative Part B</i></p> <p>Size Requirements: Small Program _____ Medium Program _____ Large Program _____ (Check One)</p> <ul style="list-style-type: none"> a. Agency included required documentation on each chart to verify that programs provide students with the opportunities to become CTE concentrators. <p>Scope Requirements: Agency included required documentation on each chart to verify that programs:</p> <ul style="list-style-type: none"> a. Provide students with opportunities for dual enrollment or articulated credit options; and, b. Are aligned with business and industry. <p>Quality Requirements: Agency included documentation on each chart to verify that programs</p> <ul style="list-style-type: none"> a. Provide students with the opportunity to earn industry certification or licensure; b. Offer students the opportunity to participate in high-skill, high-wage or high demand programs; and c. Ensure academics are an integral component of Perkins IV funded CTE programs.
<p>6. Describe the process used to evaluate and continuously improve performance of the agency.</p>
<p>7. Include a description of how the agency will:</p> <ul style="list-style-type: none"> a. Review CTE programs, and identify and adopt strategies to overcome barriers that result in lowering rates of access to, or lowering success in, the programs for special populations; b. Provide programs that are designed to enable the special populations to meet the local adjusted levels of performance; and c. Provide activities to prepare special populations, including single parents and displaced homemakers, for high-skill, high-wage or high-demand occupations that will lead to self-sufficiency.

8. Describe the agency's efforts to ensure that special populations will not be discriminated against on the basis of their status as members of special populations.
9. Describe how funds will be used to promote preparation for non-traditional fields .
10. Describe how career guidance and academic counseling will be provided to CTE students, including linkage to future education and training opportunities.
11. Describe efforts to improve: <ol style="list-style-type: none"> a. recruitment and retention of CTE teachers, faculty, and career guidance and academic counselors, b. including individuals in groups underrepresented in the teaching profession; and c. transition to teaching from business and industry.
Local Use of Funds - Requirements for Uses of Funds
Statutory Authority: Perkins IV, Section 135
Directions: Response or verification should be provided in the space following the inquiry; spaces will expand to accommodate explanation.
Funds made available to eligible recipients under this part shall be used to support career and technical education programs that ensure the following:
Integration of academics with CTE programs <ol style="list-style-type: none"> 1. How do you integrate academics with CTE? 2. How often does this integration occur? 3. Do you have a common lesson planning time for CTE and academic teachers?
Link CTE at the secondary and postsecondary level <ol style="list-style-type: none"> 1. Do you offer at least one program of study? 2. Does the agency have programs of study that: <ol style="list-style-type: none"> a. Incorporate secondary education and post-secondary education elements; b. Include coherent and rigorous content aligned with challenging academic standards and relevant career and technical content in a coordinated, non-duplicative progression of courses based on grade level that align secondary education with postsecondary education; c. May include the opportunity for secondary education students to participate in dual or concurrent enrollment programs or other ways to acquire postsecondary education credits; and d. Lead to an industry-recognized credential or certificate at the postsecondary level, or an associate or baccalaureate degree?
Students have strong experience in and understanding of all aspects of an industry, which may include work-based learning experiences. <ol style="list-style-type: none"> 1. How do you provide students with strong experience in and understanding of all aspects of industry?

<p>2. What work-based learning experiences do you offer?</p>
<p>Develop, improve, or expand the use of technology in career and industries</p> <ol style="list-style-type: none"> 1. What training in use of technology is provided to CTE teachers, faculty and administrators? 2. Is distance learning included with the training? 3. How do you provide academic and CTE skills for students that lead to entry into technology fields? 4. How do you encourage schools to collaborate with technology programs to offer voluntary internships or mentoring including programs that improve the mathematics and science knowledge of students?
<p>Provide professional development programs</p> <ol style="list-style-type: none"> 1. Describe how comprehensive professional development programs are offered for CTE teachers, administrators, counselors, etc. to address effective practices/teaching including in-service and pre-service training regarding: <ol style="list-style-type: none"> a. CTE and academic integration, provided jointly with academic teachers to the extent practicable b. Skills based on research that includes promising practices c. Practices to improve parental and community involvement d. Scientifically-based research and data to improve instruction e. Programs to ensure that those persons involved in the direct delivery of educational services to CTE students remain current in all aspects of industry f. Internship programs that provide relevant business experience g. Effective use and application of technology to improve classroom instruction
<p>Develop and implement program evaluations</p> <ol style="list-style-type: none"> 1. How do you develop and implement evaluations of the CTE programs? 2. How do you assess that the needs of special populations are being met?
<p>Initiate, improve, expand, and modernize quality career and technical education programs, including relevant technology</p> <ol style="list-style-type: none"> 1. What steps are taken to initiate a quality CTE program? 2. If need is indicated, how do you implement improvement or expansion of programs? 3. How are program updates accomplished? 4. How do you include relevant technology in the above-mentioned activities?
<p>Provide services and activities that are of sufficient size, scope, and quality to be effective See also Local Plan Section 135.</p>
<p>Preparing special populations, including single parents and displaced homemakers for high skill, high wage, or high demand occupations that will lead to self-sufficiency</p> <ol style="list-style-type: none"> 1. How do you prepare special populations enrolled in CTE programs for high-skill, high-wage or high-demand jobs? 2. What accommodations or modifications are made for students with disabilities? 3. What activities are used to prepare single parents and displaced homemakers for these jobs? 4. Give an example that illustrates these efforts.
<p>Local Uses of Funds - Permissive</p> <p>Statutory Authority: Perkins IV, Section 135(c)(1-20)</p>

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

How are Perkins funds being used to:

1. Involve parents, businesses, and labor organizations in the design, implementation, and evaluation of CTE programs?
2. Offer career guidance and academic counseling for students participating in CTE programs to improve graduation rates, provide information postsecondary and career options, and provide assistance to postsecondary students and adults who are changing careers or upgrading skills?
3. Fund local education and business partnerships, including work-related experiences for students, adjunct faculty arrangements for qualified industry professionals, and industry experience for teachers and faculty?
4. Provide programs for special populations?
5. Assist career and technical student organizations?
6. Provide mentoring and support services?
7. Lease, purchase, upgrade, or adapt equipment, including instructional aids and publications (including support for library resources) designed to strengthen and support academic and technical skill attainment?
8. Assist teacher preparation programs that address the integration of academics and CTE and assist persons interested in becoming CTE teachers and faculty, including persons with experience in business and industry?

9. Develop and expand postsecondary program offerings at times and in formats that are accessible for all students, including distance education?
10. Develop initiatives that facilitate the transition of sub-baccalaureate CTE students into baccalaureate degree programs, including— <ul style="list-style-type: none"> a. Articulation agreements between sub-baccalaureate degree granting CTE postsecondary educational institutions and baccalaureate degree-granting postsecondary educational institutions b. Postsecondary dual and concurrent enrollment programs c. Academic and financial aid counseling for sub-baccalaureate career and technical education students that informs the students of the opportunities for pursuing a baccalaureate degree and advises the students on how to meet any transfer requirements; and d. Other initiatives <ul style="list-style-type: none"> (i) to encourage the pursuit of a baccalaureate degree (ii) to overcome barriers to enrollment in and completion of baccalaureate degree programs, including geographic and other barriers (iii) affecting rural students and special populations
11. Provide activities to support entrepreneurship education and training?
12. Improve or develop new CTE courses, include the development of programs of study for consideration by the Florida Department of Education and courses that prepare individuals academically and technically for high-skill, high-wage, or high-demand occupations and dual or concurrent enrollment opportunities?
13. Develop and support small, personalized, career-themed learning communities?
14. Support family and consumer science programs?
15. Provide CTE programs for adults and school dropouts to enable them to complete secondary education or upgrade technical skills?
16. Assist persons who have participated in services and activities under the act in continuing their education or training or finding and appropriate job?
17. Support training and activities, such as mentoring and outreach, in nontraditional fields?
18. Provide support for training programs in automotive technologies?

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

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

Voluntary Selection and Participation

Statutory Authority: Perkins IV, Section 314

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



1. How does your agency ensure that secondary school **students are not required to choose or pursue a specific career path, major, or major area of interest?**

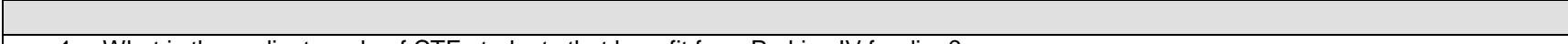
2. How does your agency ensure that students are not **required to participate** in a CTE program?



Limitation for Certain Students

Statutory Authority: Perkins IV, Section 315

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



1. What is the earliest grade of CTE students that benefit from Perkins IV funding?

2. If equipment purchased with Perkins IV funds benefits students in CTE programs earlier than the seventh grade, under what circumstances does this occur?

SECTION 3 – STATE LEADERSHIP ACTIVITIES – PERKINS IV PROTOCOL

State Leadership Activities - Required uses of funds		
Statutory Authority: Perkins IV, Section 124 (b)(1)-(9)		
Directions: <u>This form applies only to those agencies receiving Perkins Leadership funding.</u> If your agency used Perkins IV Leadership funds to complete any of the following activities? Check “ yes or no. ” If the answer is “ yes, ” answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.		
From amounts reserved under Perkins IV, section 112(a) (2), each eligible agency (FDOE) shall conduct State leadership activities as listed below. Grants are awarded to eligible recipients (LEAs, CBOs, CTSOs, colleges, and universities, etc.) to carry out one or more of the required activities for FDOE.		
Assessment of Career and Technical Education Programs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How do you assess CTE programs carried out with Perkins IV funds? 2. How do you determine that the needs of special populations as defined in Perkins IV, section 3(29) are being met? 3. How do you assess that CTE programs enable special populations as defined in Perkins IV, section 3(29) to meet state adjusted levels of performance and prepare the special populations as defined in Perkins IV, section 3(29) for further education, further training, or for high-skill, high-wage or high-demand occupations? 		
Develop, Improve, or Expand the Use of Technology in CTE	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How does your agency provide training for CTE teachers, faculty, counselors, and administrators in the use of technology, including distance learning? 2. How does your agency provide CTE students with the academic and career and technical skills (including math and science knowledge that provides a strong basis for such skills) that lead to entry into technology fields, including non-traditional fields? 3. What encouragement do you offer to schools to collaborate with technology industries to offer voluntary internships and mentoring programs? 		
Professional Development Programs	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<ol style="list-style-type: none"> 1. How did your agency provide in-service and/or pre-service training in CTE programs that focused on effective: <ol style="list-style-type: none"> a. Integration and use of challenging academic and CTE instruction provided jointly with academic teachers to the extent practicable? b. Teaching skills based on research that includes promising practices? c. Practices to improve parental and community involvement? d. Use of scientifically-based research and data to improve instruction? 2. Were the professional development programs high quality, sustained, intensive, and classroom-focused to positively impact classroom instruction and teacher performance (not one-day or short term workshops or conferences)? 3. How will the programs help teachers and personnel to improve student achievement to meet state adjusted performance levels? 4. How did the professional development support programs for public school CTE-related personnel ensure they: <ol style="list-style-type: none"> a. Stay current with industry needs, expectations, and methods? b. Effectively develop rigorous and integrated academic and CTE curriculum jointly with academic teachers, to the extent practicable? c. Develop a higher level of academic and industry knowledge and skills in CTE? d. Effectively use applied learning? 5. How did you coordinate with the teacher certification or licensing and professional development activities the state carries out under Title II of the Elementary and Secondary Education Act of 1965 and Title II of the Higher Education Act of 1965? 		
Integration	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How did your agency improve the academic and career and technical skills of students enrolled in CTE by strengthening the academic and career and technical components of CTE programs, through integrating coherent and relevant content with challenging academic standards and relevant CTE, to ensure achievement in: <ol style="list-style-type: none"> a. Core academic subjects as defined in Section 9101 of No Child Left Behind Act, including English, reading or language arts, math, science, foreign languages, civics and government, economics, arts, history and geography? b. career and technical education? 		
Preparation for Nontraditional Fields	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How did your agency provide preparation for nontraditional fields in current and emerging occupations and other activities that expose students, including populations as defined in Perkins IV, Section 3(29), to high-wage occupations? 		
Supporting Partnerships	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How did your agency support partnerships among local education agencies, institutions of higher education, adult education providers, and, as appropriate, other entities, such as employers, labor organizations, intermediaries, parents, and local partnerships to enable students to achieve state academic standards and career and technical skills or complete CTE programs of study? 		
Serving Individuals in State Institutions	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How did your agency serve individuals in state institutions, such as state correctional institutions and institutions that serve individuals with disabilities? Where were these programs located? 		
Programs for Special Populations	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How did your agency support programs for special populations that lead to high-skill, high-wage or high-demand occupations? 		

Technical Assistance	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did your agency provide technical assistance for eligible recipients?		
State Leadership Activities - Permissive uses of funds		
Statutory Authority: Perkins IV, Section 124 (c)(1)-(17) and (d)		
Directions: If your agency used Perkins IV Leadership funds to complete any of the following activities? Check YES or NO . If the answer is YES , answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.		
Improve Career Guidance and Academic Counseling	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did your agency use Perkins IV Leadership funds to improve career guidance and academic counseling programs that help students make informed academic and career and technical education decisions, including: <ul style="list-style-type: none"> a. Encouraging secondary and postsecondary students to graduate with a diploma or degree? b. Exposing students to high-skill, high-wage occupations and non-traditional fields? 		
Establish Agreements between Secondary and Postsecondary CTE Programs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did your agency use Perkins IV Leadership funds to establish agreements, such as articulation agreements, between secondary school and postsecondary CTE programs to provide postsecondary education and training opportunities for students participating in those career and technical education programs?		
Support Transition Initiatives	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did your agency use Perkins IV Leadership funds to support initiatives to help sub-baccalaureate CTE students transition into baccalaureate degree programs, including: <ul style="list-style-type: none"> a. Statewide articulation agreements between CTE postsecondary educational institutions that grant associate degrees and postsecondary educational institutions that grant baccalaureate degrees? b. Postsecondary dual and concurrent enrollment programs? c. Academic and financial aid counseling? d. Other initiatives? <ul style="list-style-type: none"> (i) To encourage the pursuit of a baccalaureate degree? (ii) To overcome barriers to participation in baccalaureate degree programs, including geographic and other barriers affecting rural students and special populations? 		
Support for Career and Technical Student Organizations	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did your agency use Perkins IV Leadership funds to support career and technical student organizations (CTSOs), especially efforts to increase the participation of students who are members of special populations identified in Perkins IV, Section 3(29)?		

Support for Public Charter Schools	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did your agency use Perkins IV Leadership funds to support public charter schools operating CTE programs?		
All Aspects of an Industry	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did your agency use Perkins IV Leadership funds to support CTE programs that offer experience in, and understanding of, all aspects of an industry for which students are being trained?		
Support for Family and Consumer Sciences Programs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did your agency use Perkins IV Leadership funds to support family and consumer sciences programs?		
Support for Partnerships between Education and Business	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did you use Perkins IV Leadership funds to support partnerships between education and business or business intermediaries, including cooperative education and adjunct faculty arrangements at the secondary and postsecondary levels?		
Support New or Improved CTE Courses and Initiatives	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did you use Perkins IV Leadership funds to support the improvement or development of new CTE courses and initiatives, including career clusters, career academies, and distance education, that prepare individuals academically and technically for high skill, high wage, or high demand occupations?		
Incentive Grants	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>Did you use Perkins IV Leadership funds to award incentive grants to eligible recipients?</p> <p>a. For exemplary performance in carrying out programs under this act, based on:</p> <p>(i) Eligible recipients exceeding the local adjusted levels of performance established under section 113(b) in a manner that reflects sustained or significant improvement?</p> <p>(ii) Eligible recipients effectively developing connections between secondary education and postsecondary education and training?</p> <p>(iii) Adoption and integration of coherent and rigorous content aligned with challenging academic standards and technical coursework?</p> <p>(iv) Eligible recipients' progress in having special populations identified in section 3(29) of Perkins IV who participate in CTE programs meet local adjusted levels of performance?</p> <p>(v) Other factors relating to the performance of eligible recipients under the Perkins IV as the Florida Department of Education determines are appropriate</p> <p>b. If an eligible recipient elects to pool funds with one or more other eligible recipients for innovative initiatives?</p>		
Support Entrepreneurship	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. What activities does your agency provide that support entrepreneurship education and training?		
Provide CTE Programs that Coordinate with Adult Education Programs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How does the agency provide CTE programs for adults and school dropouts to complete their secondary school education that		

coordinate, to the extent practicable, with adult education and family literacy activities authorized under the Adult Education and Family Literacy Act?		
Providing Transition Assistance to CTE Participants	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. What assistance does the agency provide to individuals, who have participated in services and activities under Perkins IV, to continue their education or training or find appropriate jobs, such as through referral to a one-stop center established under the Workforce Investment Act?		
Assessments	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How does the agency develop valid and reliable assessments of technical skills?		
Data Systems	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Has the agency developed and enhanced data systems to collect and analyze data on secondary and postsecondary academic and employment outcomes?		
Staff Recruitment and Retention	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. What steps has the agency taken to improve: <ul style="list-style-type: none"> a. The recruitment and retention of CTE teachers, faculty, administrators, and career guidance and academic counselors, including individuals in groups underrepresented in the teaching profession; and b. The transition to teaching from business and industry, including small business? 		
Support for Occupational and Information Resources	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How does the agency support occupational and employment information resources, such as those provided under section 118 of Perkins IV?		
Restriction on Uses of Funds	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How did the agency ensure that these funds were not used to fund administrative costs?		

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

Provider:	Date:	Position Interviewed:	Monitor:
Career and Technical Education Data and Assessment			
Statutory Authority: Perkins IV, Section 113; Section 1008.405 F.S.; 6A-6.014, Florida Administrative Code (FAC)			
Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.			
Data Foundation and Structure			
<ol style="list-style-type: none"> 1. List the assessments currently used by your agency. 2. Has agency staff been trained in the administration and security of these assessments? 3. Does your agency have written procedures for collection, verification, analysis and reporting of student data? 4. What procedures are in place for tracking students following participation in the agency's program(s)? 5. What process does the agency use for collecting and reporting data on student progress consistent with the Florida curriculum frameworks (including occupational completion points earned)? 6. What process does the agency use for collecting and reporting data for career certificates, diplomas or degrees awarded? 7. How does your agency use the data that it collects? 			
Data Collection and Verification			
<ol style="list-style-type: none"> 1. Does your agency use an electronic management information system (MIS), used by all programs, that has individual student records within a relational data base structure? 2. Does your agency have specific staff (positions) with clear responsibility for data collection, data entry, and data verification? What are these staff positions? Provide position descriptions for each. 3. <u>For school districts only</u> – How does your district capture data relating to industry certifications or technical skill attainments by third-party assessment that the student has taken, and whether or not the student passed? 4. What is the role of the CTE director/coordinator in the verification of data? 5. How is student attendance tracked and reported in your data system? 6. How often is data entered into the agency's MIS system? 7. Who has the responsibility of correcting missing and erroneous data reported to you by the state? Is program staff involved in this process? 			
Data Analysis and Reporting			
<ol style="list-style-type: none"> 1. How often do you access your agency's data? 2. Which staff is able to readily access and print data reports? 3. How is data, including Perkins performance data, used for program management and improvement? 4. How do you share data results with your staff? 			
Staff Development			

1. Has agency staff been provided training on general assessment and data requirements, including assessment policy and procedures, follow-up policies? If so, which staff members receive this training?
2. Which staff members receive training on data collection and/or data entry procedures?
3. Which staff members receive training on how to produce and/or interpret reports produced by the MIS?
4. Has training been provided to your staff on conducting follow-up survey or data-matching procedures?
5. Has agency staff received training on distance education policy and use of proxy hours, if estimated?
6. Which staff members participate in MISATFOR and WEDDAC meetings? (districts and colleges)

DATA VERIFICATION

DATA - Student Records Review – Career and Technical Education

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

Initials/ NA	Document/ Process	Comments
	Attendance is captured in agency MIS and matches information in student folder	
	Individual student subtest reports in student folders match student test data from MIS data system	
	Subsequent test report (if any) indicates variance of the form of the test from the previous form given (for example, M9 then M10)	
	Subsequent test level (if any) is determined by previous test scores	
	Student portfolio	
	Checklist	
	Occupational completion point attainment	
	Career certificate (including post-secondary career certificates in colleges)	
	Career diploma	
	Career degree (colleges only)	
	Industry certification or technical skill attainment by third party assessment	
	End-of-course or end-of-program assessment	

Module F

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**SECTION 1 – FINANCIAL MANAGEMENT SYSTEMS
PROTOCOL**

Provider:	Date:	Position Interviewed:	Monitor:
Financial Management System			
Statutory Authority: Education Department General Administrative Regulations (EDGAR), Section 80.20(a)(1)-(6)			
Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.			
Financial Reporting			
<ol style="list-style-type: none"> 1. Does your agency have fiscal policies and procedures that include standard accounting practices, budgeting, and documenting and reporting procedures? 2. How do you monitor your grant expenditures? 3. How do program and fiscal managers coordinate their activities so information can be shared? 			
Accounting records			
<ol style="list-style-type: none"> 1. What process does your agency use to maintain detailed accounting records? 2. How are your accounting, procurement and inventory management systems linked to minimize problems? 			
Internal control			
<ol style="list-style-type: none"> 1. What controls are in place to protect technology and equipment acquired with federal funds? 2. How do you assure that property is used solely for authorized purposes? 			
Budget control			
<ol style="list-style-type: none"> 1. What process is in place for reconciling budgeted amounts with actual expenditures where payments to you are based on expenditures and performance? 			
Allowable cost			
<ol style="list-style-type: none"> 1. Which staff positions have responsibility for approving expenditures (purchases) under the grant? 2. How do you ensure that expenditures are "reasonable, allowable and allocable"? 			
Source documentation			
<ol style="list-style-type: none"> 1. How do you document various accounting transactions (payroll, purchases, etc.)? 			

SECTION 2 – FISCAL – PROCUREMENT AND CONTRACTS PROTOCOL

Provider:	Date:	Position Interviewed:	Monitor:
Procurement (including purchasing and contracting)			
Statutory Authority: EDGAR, Section 80.36 (b)-(j)			
Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.			
<u>Procurement Procedures</u>			
<ol style="list-style-type: none"> 1. Explain the procurement procedures for purchasing equipment using grant funds. How are purchase requests processed? 2. Explain the procurement procedures for contracting for goods or services using grant funds. (if applicable) 3. Do you have a contract manager? 			
<u>Deliverables</u>			
<ol style="list-style-type: none"> 1. What internal controls are in place to guarantee that contracts contain clear deliverables? 2. How does the agency know when deliverables are completed? 3. Does the system ensure that contractors submit written invoices according to the schedule outlined in the contract or when deliverables are completed? 			
<u>Code of standards of conduct</u>			
<ol style="list-style-type: none"> 1. How does the provider ensure that staff is aware of the information contained in the code of standards of conduct and abide by it? 2. Have there ever been violations of the provider’s code of ethics? If so, how were they handled? 3. What procedures does the agency have to assure that persons procuring services do not have a conflict of interest in selecting, awarding, or administering the contract? 			
<u>Purchasing</u>			
<ol style="list-style-type: none"> 1. How does the provider practice economical purchasing? Does the provider have agreements in place to maximize purchasing potential? Elaborate. 2. What is the provider’s purchasing process for items less than \$500? More than \$5,000? 3. How does the provider purchase computers? Classroom supplies such as pencils? 			
<u>Contracts</u>			
<ol style="list-style-type: none"> 1. How does the provider ensure that it has entered into contracts with entities that have not been suspended or debarred from participating in contracts supported with Federal funds? 2. How does the agency monitor the contract performance? 3. Invoices provide sufficient documentation to support the payment request. 4. How does the provider handle disputes with a contractor? 5. Was FDOE notified of any disputes? If so, how? Have any disputes have gone to a due process hearing? 6. If travel was reimbursed, reimbursement is consistent with state travel requirements. 			

<p><u>Records</u></p> <ol style="list-style-type: none"> 1. Does the provider maintain records sufficient enough to detail the history of a procurement? 2. Do these records include such items as: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price?
<p>Competition</p> <ol style="list-style-type: none"> 1. How does the provider ensure full and open competition in procurement transactions? 2. Are there written procedures in place for procurement transactions?
<p>Methods of procurement to be followed</p> <ol style="list-style-type: none"> 1. Which methods does the agency use to procure goods and services with Federal funds? (Small purchase procedures, sealed bids, competitive proposals, or noncompetitive proposals?)
<p>Contracting with small and minority firms, women’s business enterprise and labor surplus area firms</p> <ol style="list-style-type: none"> 1. What steps does the agency take to encourage participation in the contract process by small and minority businesses and women’s business enterprises?
<p>Contract cost and price</p> <ol style="list-style-type: none"> 1. What documentation of cost and/or price analyses that were done for the last three contracts awarded by the agency can you provide?
<p>Awarding agency review – Sample documentation</p> <ol style="list-style-type: none"> 1. Can you provide all documents during the entire cycle of the procurement process for the last three procurements made by the agency? Would you have examples of a competitive procurement, sealed bids, noncompetitive proposal, or small purchase procedures?
<p>Bonding requirements</p> <ol style="list-style-type: none"> 1. How do you ensure that construction or facility improvement contractors are adequately bonded or have filed payment or performance bonds with the Clerk of Court?
<p>Contract provisions</p> <ol style="list-style-type: none"> 1. What is your process for ensuring that contracts that are funded with Federal money include the contract provisions required by this section of EDGAR?
<p>Contracting with faith-based organizations</p> <ol style="list-style-type: none"> 1. What steps does the agency take to encourage participation by faith-based organizations in the contract and/or procurement process? 2. How do you ensure that inherently religious activities are kept separate from contracted programs/services?

SECTION 3 – FISCAL – EQUIPMENT PROTOCOL

Provider:	Date:	Person Interviewed:	Monitor:
Fiscal – Equipment			
Statutory Authority: Education Department General Administrative Regulations (EDGAR) Section 80.32 (c)-(d)			
Directions: Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.			
Use			
<ol style="list-style-type: none"> 1. How does the agency use the equipment that was purchased with grant funds? 2. Is equipment assigned to specific personnel or departments or rooms? 3. Is the equipment ever used for other projects or programs? How does this work? 4. When the agency needs to replace equipment, what is done with the old equipment? 			
Management requirements			
<ol style="list-style-type: none"> 1. What staff position is responsible for equipment? 2. Is there a reasonable system in place to track the purchase, use, and disposal of equipment? 3. Describe the process used to inventory equipment. How often does the agency conduct a physical inspection of equipment? 4. Does the agency's inventory contain the required elements? (see equipment checklist) 5. Does the provider reconcile any discrepancies between current and previous inventory at least every two years? When was this last done? 6. Where is equipment stored? Is there a system in place to safeguard/secure equipment? Describe this system. 7. Have there been any reports of loss, damage or theft in the last 12 months? If so, how were they handled? 8. Who is responsible for the maintenance of equipment? Discuss the current maintenance procedures? 			
Disposition - Federal equipment - Right to transfer title			
<ol style="list-style-type: none"> 1. How does the agency dispose of equipment acquired under a grant that is no longer needed for the original project or program? 			

SECTION 4 – ALLOWABLE COSTS – SCHOOL DISTRICTS PROTOCOL

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

Fiscal - Allowable/Unallowable Costs - School Districts

Statutory Authority: OMB Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments," Attachment B; OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations"

Directions: Did your school district spend federal grant funds on any of the numbered items below? Check **YES** or **NO**. If the answer is **YES**, find that numbered item in the following pages and answer the questions for that section.

Selected Item of Cost	YES	NO	Selected Item of Cost	YES	NO
1) Advertising and public relations costs			23) Interest		
2) Advisory councils			24) Lobbying		
3) Alcoholic beverages			25) Maintenance, operations and repairs		
4) Audit costs and related services			26) Materials and supplies costs		
5) Bad debts			27) Meetings and conferences		
6) Bonding costs			28) Memberships, subscriptions and professional activity costs		
7) Communication costs			29) Patent costs		
8) Compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits)			30) Plant and homeland security costs		
9) Contingency provisions			31) Pre-award costs		
10) Defense and prosecution of criminal and civil proceedings and claims			32) Professional service costs		
11) Depreciation and use allowances			33) Proposal costs		
12) Donations and contributions			34) Publication and printing costs		
13) Employee morale, health and welfare costs			35) Rearrangement and alteration costs		
14) Entertainment costs			36) Reconversion costs		
15) Equipment and other capital expenditures			37) Rental costs of buildings and equipment		
16) Fines and penalties			38) Royalties and other costs for the use of patents		
17) Fund-raising and investment management costs			39) Selling and marketing		
18) Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of federal programs			40) Taxes		

19) General government expenses			41) Termination costs applicable to sponsored agreements		
20) Goods or services for personal use			42) Training costs		
21) Idle facilities and idle capacity (unused capacity of partially used facilities)			43) Travel costs		
22) Insurance and indemnification					

Provider:	Date:	Position Interviewed:	Monitor:
Fiscal - Allowable/Unallowable Costs - School Districts			
<p>Statutory Authority: OMB Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments," Attachment B; OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations"</p> <p>Directions: Did your school district spend federal grant funds on any of the <u>numbered</u> items below? Check yes or no. If the answer is yes, answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.</p>			
1) Advertising and public relations costs			<input type="checkbox"/> YES <input type="checkbox"/> NO
1. Did the district advertise teaching vacancies? In what media? Were Perkins IV or Adult Ed funds used to purchase the advertisements? 2. What other ads did the district purchase? In what media? 3. Did the district use Perkins IV or adult education funds to cover costs of meetings or conventions? Displays, demonstrations, or exhibits? Meeting rooms, hospitality suites, booths or other special facilities? 4. Did Perkins IV or adult education funding provide salaries and wages for employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings? 5. Were federal funds used to cover costs of promotional items and memorabilia, including models, gifts, and souvenirs? 6. Were the district's advertising and public relations costs designed to promote the district's programs or the district itself?			
2) Advisory councils			<input type="checkbox"/> YES <input type="checkbox"/> NO
1. Were federal funds used to cover any costs related to advisory councils?			
3) Alcoholic beverages			<input type="checkbox"/> YES <input type="checkbox"/> NO
1. Were federal funds expended for costs of alcoholic beverages?			
4) Audit costs and related services			<input type="checkbox"/> YES <input type="checkbox"/> NO
1. Were federal funds expended for audit costs and related expenses such as audits required by, and performed in accordance with, the Single Audit Act?			
5) Bad debts			<input type="checkbox"/> YES <input type="checkbox"/> NO
1. Were federal funds expended to cover bad debts, including losses (whether actual or estimated) arising from uncollectible accounts and other claims, related collection costs, and related legal costs?			
6) Bonding costs			<input type="checkbox"/> YES <input type="checkbox"/> NO
1. Were federal funds expended for bonding costs required by the federal government as assurance against financial loss to itself, including bonds such as bid, performance, payment, advance payment, infringement and fidelity bonds? 2. Are bonding costs required in the general conduct of operations of the district?			

7) Communication costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs such as telephone services, local and long distance telephone calls, telegrams, postage, messenger, electronic or computer transmittal services? 2. Is a log kept for these services? 3. Does the agency have a policy in place that covers employee reimbursement of personal calls? 		
8) Compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits)	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How do you document salaries and wages charged to federal grants? 2. Is the total compensation reasonable for the services rendered? Does it conform to the established policy of the district consistently applied to both federal and non-federal activities? 3. Who approves payroll? 4. Where employees work solely on a single federal award or cost objective, were charges for their salaries and wages supported by periodic certifications that the employees worked solely on that program for the period covered by the certification? <ol style="list-style-type: none"> a. Were these certifications prepared at least semi-annually and signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee? 5. Where employees work on multiple activities or cost objectives, was a distribution of their salaries or wages supported by personnel activity reports (PARs)? <ol style="list-style-type: none"> a. Do these PARs reflect an after-the-fact distribution of the actual activity of each employee? b. Do they account for the total activity for which each employee is compensated? c. Are they prepared at least monthly and coincide with one or more pay periods? d. Are they signed by the employee? e. Do they reflect budget estimates or other distribution percentages determined before the services are performed? If so, they do not qualify as support for charges to federal awards. 6. If federal funds have been expended for severance pay: <ol style="list-style-type: none"> a. Was severance pay required by law, by employee/employer agreement or by established written policy? b. Was severance pay associated with normal turnover and allocated as an indirect cost? 		
9) Contingency provisions	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended as contributions to a contingency reserve or any similar provision made for events the occurrence of which cannot be foretold with certainty as to time, intensity, or with an assurance of their happening? (The term "contingency reserve" excludes self-insurance reserves, pension plan reserves, and post-retirement health and other benefit reserves computed using acceptable actuarial cost methods.) 		
10) Defense and prosecution of criminal and civil proceedings and claims	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. If federal funds were expended for defense of criminal and civil proceedings and claims, were they for legal expenses required in the administration of federal programs? 		
11) Depreciation and use allowances	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<ol style="list-style-type: none"> 1. Were federal funds expended as compensation for depreciation and/or use allowances for the use of fixed assets (buildings, capital improvements, and equipment)? 2. Was the computation of depreciation or use allowances based on the acquisition cost of the assets involved? 3. Are the charges for use allowances or depreciation supported by adequate property records and physical inventories that are taken at least once every two years to ensure that the assets exist and are usable, used and needed? 		
12) Donations and contributions	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for contributions or donations (including cash, property, and services) made by the school district? 2. Was the value of donated or volunteer services (furnished to a district by professional and technical personnel, consultants, or other skilled and unskilled labor) reimbursed as a direct or indirect cost using Federal funds? 3. Was the value of donated services received by the school district used to meet cost-sharing or matching requirements? 		
13) Employee morale, health and welfare costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for the costs of employee information publications, health or first-aid clinics and/or infirmaries, recreational activities, employee counseling services, and any other expenses incurred in accordance with the school district's established practice or custom for the improvement of working conditions, employer-employee relations, employee morale, and employee performance? <ol style="list-style-type: none"> a. Were such costs equitably apportioned to all activities of the school district? b. Was income generated from any of these activities offset against expenses? 		
14) Entertainment costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities)? 	<input type="checkbox"/> YES	<input type="checkbox"/> NO

15) Equipment and other capital expenditures	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for acquisition costs of capital assets (for general purpose equipment, buildings and land) or for expenditures to make improvements to capital assets that materially increase their value or useful life?</p> <p>a. If capital expenditures were direct charges to the grant, were they approved in advance by FDOE?</p> <p>b. Were equipment and other capital expenditures included in indirect costs?</p> <p>c. When equipment purchased wholly or partly with federal funds is replaced, what is done with the replaced equipment? Is it used as a trade-in? Is it sold and the proceeds used to offset the cost of the replacement property? Is it surplus? Is it given to another federal program for use in that program?</p> <p>d. When approved as a direct charge, were these capital expenditures charged in the period in which the expenditure was incurred, or as otherwise determined appropriate by and negotiated with FDOE?</p>		
16) Fines and penalties	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended to cover costs resulting from violations of, or failure of the school district to comply with federal, state, and local or foreign laws and regulations?</p>		
17) Fund-raising and investment management costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended to cover costs of organized fund raising?</p> <p>2. Were federal funds expended to cover costs of investment counsel and staff and similar expenses incurred solely to enhance income from investments?</p> <p>3. Were federal funds expended for costs associated with investments covering pension, self- insurance, or other funds which include federal participation allowed by OMB Circular A-87?</p>		
18) Gains and losses on disposition of depreciable property and other capital assets and substantial relocation of federal programs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were gains and losses on the sale, retirement, or other disposition of depreciable property included in the year in which they occur as credits or charges to the asset cost grouping(s) in which the property was included?</p>		
19) General government expenses	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for any of the following general costs of government:</p> <p>a. Salaries and expenses of the Office of the Governor or a state or the chief executive of a political subdivision or the chief executive of a federally recognized Indian tribal government?</p> <p>b. Salaries and other expenses of a state legislature, tribal council, or similar local governmental body, such as a county supervisor, city council, school board, etc., whether incurred for purposes of legislation or executive direction?</p> <p>c. Costs of the judiciary branch of a government?</p> <p>d. Costs of prosecutorial activities unless treated as a direct cost to a specific program if authorized by program statute or regulation (however, this does not preclude the allowability of other legal activities of the attorney general)?</p> <p>2. Were federal funds expended for the portion of salaries and expenses directly attributable to managing and operating federal programs by the chief executive of a federally recognized Indian Tribal Government or Councils of Governments (COGs) and his or her staff?</p>		

20) Goods or services for personal use	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs of goods or services for personal use of the school district's employees? 2. Were these costs reported as taxable income to the employees? 		
21) Idle facilities (completely unused facilities) and idle capacity (unused capacity of partially used facilities)	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for "cost of idle facilities" such as maintenance, repair, housing, rent, and other related costs such as insurance, interest, property taxes, and depreciation or use allowances? <ol style="list-style-type: none"> a. Were the costs of idle facilities necessary to meet fluctuations in workload? b. Were facilities idle due to changes in program requirements, efforts to achieve more economical operations, reorganization, and termination or due to unforeseen reasons? 2. Were federal funds expended for maintenance, repair, housing, rent and other related costs such as insurance, interest, property taxes and depreciation or use allowances for equipment and/or buildings with idle capacity? <ol style="list-style-type: none"> a. Were the costs of idle capacity normal costs of doing business and a factor in the normal fluctuations of usage from period to period? 		
22) Insurance and indemnification	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were the costs of insurance required or approved and maintained as required by the federal award? 2. Were federal funds expended for costs of other insurance maintained by the school district in connection with the general conduct of its activities? <ol style="list-style-type: none"> a. Were the types and extent and cost of coverage in accordance with sound business practices? b. Were the costs for insurance or of any contributions to any reserve covering the risk of loss of or damage to federally owned property? 3. Were the costs for actual losses which could have been covered by permissible insurance (through self-insurance or otherwise)? 4. Were these costs for deductibles or minor losses not covered by insurance, such as the spoilage, breakage and disappearance of small hand tools? 5. Were the contributions to a reserve for certain self-insurance programs including workers compensation, unemployment compensation, and severance pay? 6. Were the costs for actual claims paid to or on behalf of employees or former employees for workers compensation, unemployment compensation, severance pay and similar employee benefits? 7. Were the costs for indemnification, securing the school district against liabilities to third persons and other losses not compensated by insurance, and expressly provided for in the federal award? 8. Were the costs for commercial insurance to protect against costs of the contractor for corrections of the contractor's own defects in materials or workmanship? 		

23) Interest	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred for interest on borrowed capital or the use of the school district's own funds? 2. Were federal funds expended for financing costs (including interest) paid or incurred which are associated with otherwise allowable costs of building acquisition, construction, or fabrication, reconstruction or remodeling completed on or after October 1, 1980? 3. Were federal funds expended for financing costs (including interest) paid or incurred on or after September 1, 1995, for land or associated with otherwise allowable costs of equipment? 		
24) Lobbying	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for the cost of certain influencing activities associated with obtaining grants, contracts, cooperative agreements, or loans? 2. Were federal funds expended for executive lobbying costs? 		
25) Maintenance, operations, and repairs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred for necessary maintenance, repair, or upkeep of buildings and equipment (including federal property unless otherwise provided for) which neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in an efficient operating condition? (Costs incurred for improvements which add to the permanent value of the buildings and equipment or appreciably prolong their intended life shall be treated as capital expenditures.) 		
26) Materials and supplies costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred for materials, supplies and fabricated parts necessary to carry out a federal award? 2. Were purchased materials and supplies charged at their actual prices, net of applicable credits? (Withdrawals from general stores or stockrooms should be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs.) 3. Were materials and supplies actually used for the performance of a federal award charged as direct costs? 4. Was there a charge for federally-donated or furnished materials used in performing the federal award? 		
27) Meetings and conferences	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for the costs of meetings and conferences, the primary purpose of which is the dissemination of technical information? (This includes costs of meals, transportation, rental of facilities, speakers' fees, and other items incidental to meetings or conferences.) 		

28) Memberships, subscriptions and professional activity costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs of the school district's: a. Membership in business, technical, and professional organizations; b. Subscriptions to business, professional, and technical periodicals; and/or c. Membership(s) in any organization that engages in lobbying activities?		
29) Patent costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for any of the following activities: a. Cost of preparing disclosures, reports, and other documents required by the federal award and of searching the art to the extent necessary to make such disclosures; b. Cost of preparing documents and any other patent costs in connection with the filing and prosecution of a United States patent application where title or royalty-free license is required by the Federal Government to be conveyed to the Federal Government; c. General counseling services relating to patent and copyright matters, such as advice on patent and copyright laws, regulations, clauses, and employee agreements; d. Cost of preparing disclosures, reports, and other documents and of searching the art to the extent necessary to make disclosures not required by the award; and/or e. Costs in connection with filing and prosecuting any foreign patent application, or any United States patent application, where the federal award does not require conveying title or a royalty-free license to the Federal Government?		
30) Plant and homeland security costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for necessary and reasonable expenses incurred for routine and homeland security to protect facilities, personnel, and work products? (expenses such as: wages and uniforms of personnel engaged in security activities, equipment, barriers, contractual security services, consultants)		
31) Pre-award costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs incurred prior to the effective date of the award directly pursuant to the negotiation and in anticipation of the award where such costs are necessary to comply with the proposed delivery schedule or period of performance?		
32) Professional service costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for the costs of professional and consultant services tendered by persons who are members of a particular profession or possess a special skill and who are not officers or employees of the school district?		
33) Proposal costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended on costs of preparing proposals for potential Federal Awards?		
34) Publication and printing costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<ol style="list-style-type: none"> 1. Were federal funds expended for publication costs such as the costs of printing (including the processes of composition, plate-making, press work, binding, and the end products produced by such processes), distribution, promotion, mailing, general handling and/or page charges in professional publications? 2. Were costs not identifiable with a particular cost objective allocated as indirect costs to all benefiting activities of the school district? 3. If federal funds were expended for page charges for professional journal publications as a necessary part of research costs, did the research papers report work supported by the federal government? <ol style="list-style-type: none"> a. Are the charges levied impartially on all research papers published by the journal, whether or not by federally-sponsored authors? 			<input type="checkbox"/>	<input type="checkbox"/>
35) Re-arrangement and alteration costs			YES	NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred for ordinary and normal rearrangement and alteration of facilities? 2. Was prior approval granted by the USDOE for special arrangements and alteration costs incurred specifically for the project? 				
36) Reconversion costs			<input type="checkbox"/>	<input type="checkbox"/>
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred in the restoration or rehabilitation of the school district's facilities to approximately the same condition existing immediately prior to the commencement of a federal award? 2. Were federal funds expended to cover the cost of wear and tear on the school district's facilities? 			YES	NO
37) Rental costs of buildings and equipment			<input type="checkbox"/>	<input type="checkbox"/>
<ol style="list-style-type: none"> 1. Are rental costs reviewed periodically to determine reasonableness? (Based on rental costs of comparable property, market conditions in the area, alternatives available, type, life expectancy, condition and value of the property leased.) 2. Are rental costs under "sale and lease back" and "less-than-arms-length" leases equal to the amounts that would have been allowed had title to the property been held by the school district? 			YES	NO
38) Royalties and other costs for the use of patents			<input type="checkbox"/>	<input type="checkbox"/>
<ol style="list-style-type: none"> 1. Have federal funds been expended on royalties on a patent or copyright or amortization of the cost of acquiring by purchase a copyright, patent, or rights, necessary for the proper performance of the award? <ol style="list-style-type: none"> a. Does the federal government have a license or the right to free use of the patent or copyright? b. Has the patent or copyright been adjudicated to be invalid, or been administratively determined to be invalid? c. Is the patent or copyright considered to be unenforceable? d. Has the patent or copyright expired? 2. Did the school district exercise special care in determining reasonableness where the royalties may have been arrived at as the result of a less-than-arm's-length bargaining? (Such as with persons or corporations affiliated with the school district or unaffiliated parties under an agreement entered into in anticipation that a federal award would be made.) 			YES	NO

39) Selling and marketing costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs of selling and marketing any products or services of the school district that were not allowable as public relations costs?		
40) Taxes	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended on taxes that a school district is legally required to pay (except for self-assessed taxes that disproportionately affect federal programs or changes in tax policies that disproportionately affect federal programs)?		
2. Were federal funds expended for gasoline taxes, motor vehicle fees, and other taxes that are in effect user fees for benefits provided to the federal government?		
41) Termination costs applicable to sponsored agreements	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. If an award has been terminated, were there certain costs that could not be discontinued immediately after the effective date of termination?		
42) Training costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for the cost of training provided for employee development?		
43) Travel costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were all travel expenses (transportation, lodging, subsistence and related items) incurred for the official business of the school district?		
2. Are all travel charges reasonable and consistent with the school district's written travel policy?		
3. Are all airfare costs coach or equivalent unless they meet the exceptions in OMB Circular A-87?		

SECTION 5 – ALLOWABLE COSTS – UNIVERSITIES AND COLLEGES PROTOCOL

Provider:	Date:	Position Interviewed:	Monitor:
Fiscal – Allowable/Unallowable Costs – Universities and Colleges			
Statutory Authority: OMB Circular A-21, “Cost Principles for Educational Institutions, “Section J; OMB Circular A-133, “Audits of States, Local Governments, and Non-Profit Organizations”			
Directions: Did your college or university spend federal grant funds on any of the <u>numbered</u> items below? Check Yes or No . If the answer is Yes , find that numbered item in the following pages and answer the questions for that section.			
Selected Item of Cost			
	Yes	No	
1) Advertising and public relations costs			28) Lobbying
2) Advisory councils			29) Losses on other sponsored agreements or contracts
3) Alcoholic beverages			30) Maintenance and repair costs
4) Alumni activities			31) Materials and supplies costs
5) Audit costs and related services			32) Meetings and conferences
6) Bad debt			33) Memberships, subscriptions and professional activity costs
7) Bonding costs			34) Patent costs
8) Commencement and convocation costs			35) Plant and homeland security costs
9) Communication costs			36) Pre-agreement costs
10) Compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits)			37) Professional service costs
11) Contingency provisions			38) Proposal costs
12) Deans of faculty and graduate schools			39) Publication and printing costs
13) Defense and prosecution of criminal and civil proceedings and claims			40) Rearrangement and alteration costs
14) Depreciation and use allowances			41) Reconversion costs
15) Donations and contributions			42) Recruiting costs
16) Employee morale, health and welfare costs			43) Rental costs of buildings and equipment
17) Entertainment costs			44) Royalties and other costs for uses of patents
18) Equipment and other capital expenditures			45) Scholarships and student aid costs
19) Fines and penalties			46) Selling and marketing costs
20) Fund-raising and investment management costs			47) Specialized service facilities
21) Gains and losses on			48) Student activity costs

depreciable assets					
22) Goods or services for personal use			49) Taxes		
23) Housing and personal living expenses			50) Termination costs applicable to sponsored agreements		
24) Idle facilities and idle capacity (unused capacity of partially used facilities)			51) Training costs		
25) Insurance and indemnification			52) Transportation costs		
26) Interest			53) Travel costs		
27) Labor relations costs			54) Trustees		

Provider:	Date:	Position Interviewed:	Monitor:
<p>Fiscal – Allowable/Unallowable Costs – Educational Institutions (Universities/Colleges/Community Colleges)</p> <p>Statutory Authority: OMB Circular A-21, “Cost Principles for Educational Institutions,” Section J; OMB Circular A-133, “Audits of States, Local Governments, and Non-Profit Organizations”</p> <p>Directions: Did your college or university spend federal grant funds on any of the numbered items below? Check YES or NO. If the answer is YES, answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.</p>			
1) Advertising and public relations costs			<input type="checkbox"/> YES <input type="checkbox"/> NO
<ol style="list-style-type: none"> Did the college or university advertise staff vacancies? In what media? Were Perkins IV or Adult Ed funds used to purchase the advertisements? What other ads did the college or university purchase? In what media? Did the college/university use Perkins IV or adult education funds to cover costs of meetings or conventions? Displays, demonstrations, or exhibits? Meeting rooms, hospitality suites, booths or other special facilities? Did Perkins IV or adult education funding provide salaries and wages for employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings? Were federal funds used to cover costs of promotional items and memorabilia, including models, gifts, and souvenirs? Were the institution’s advertising and public relations costs designed to promote the institution’s programs or the institution itself? 			
2) Advisory councils			<input type="checkbox"/> YES <input type="checkbox"/> NO
<ol style="list-style-type: none"> Were federal funds used to cover any costs related to advisory councils? 			
3) Alcoholic beverages			<input type="checkbox"/> YES <input type="checkbox"/> NO
<ol style="list-style-type: none"> Were federal funds expended for costs of alcoholic beverages? 			
4) Alumni(ae) activities			<input type="checkbox"/> YES <input type="checkbox"/> NO
<ol style="list-style-type: none"> Were federal funds expended for costs incurred for or in support of alumni (ae) activities and similar services? 			
5) Audit costs and related services			<input type="checkbox"/> YES <input type="checkbox"/> NO
6) Bad debt			<input type="checkbox"/> YES <input type="checkbox"/> NO
<ol style="list-style-type: none"> Were federal funds expended to cover bad debts, including losses (whether actual or estimated) arising from uncollectible accounts and other claims, related collection costs and related legal costs? 			

7) Bonding costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for bonding costs required by the federal government as assurance against financial loss to itself, including bonds such as bid, performance, payment, advance payment, infringement, and fidelity bonds? 2. Are bonding costs required in the general conduct of operations of the college or university? 		
8) Commencement and convocation costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred for commencements and convocations? <ol style="list-style-type: none"> a. Were these funds expended for salaries and fringe benefits of members of the academic staff whose responsibilities to the institution require administrative work that benefits commencements and convocations? 		
9) Communication costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for telephone services, local and long distance telephone calls, telegrams, postage, messenger, electronic or computer transmittal services? 		
10) Compensation for personal services	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. How do you document salaries and wages charged to federal grants? 2. Is the total compensation reasonable for the services rendered? Does it conform to the established policy of the college or university consistently applied to both federal and non-federal activities? 3. Who approves payroll? 4. Where employees work solely on a single federal award or cost objective, were charges for their salaries and wages supported by periodic certifications that the employees worked solely on that program for the period covered by the certification? <ol style="list-style-type: none"> a. Were these certifications prepared at least semi-annually and signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee? 5. Where employees work on multiple activities or cost objectives, was a distribution of their salaries or wages supported by personnel activity reports (PARs)? <ol style="list-style-type: none"> a. Do these PARs reflect an after-the-fact distribution of the actual activity of each employee? b. Do they account for the total activity for which each employee is compensated? c. Are they prepared at least monthly and coincide with one or more pay periods? d. Are they signed by the employee? The supervisor? 6. Do they reflect budget estimates or other distribution percentages determined before the services are performed? If so, they do not qualify as support for charges to federal awards. 7. If federal funds have been expended for severance pay: <ol style="list-style-type: none"> a. Was severance pay required by law, by employee/employer agreement or by established written policy? b. Was severance pay associated with normal turnover and allocated as an indirect cost? 		
11) Contingency provisions	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<p>1. Were federal funds expended as contributions to a contingency reserve or any similar provision made for events the occurrence of which cannot be foretold with certainty as to time, intensity or with an assurance of their happening? (The term "contingency reserve" excludes self-insurance reserves, pension plan reserves, and post-retirement health and other benefit reserves computed using acceptable actuarial cost methods.)</p>		
<p>12) Deans of faculty and graduate schools</p>	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for salaries and expenses of deans of faculty and graduate schools, or their equivalents, and their staff?</p>		
<p>13) Defense and prosecution of criminal and civil proceedings, claims, appeals, and patent infringement</p>	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. If federal funds were expended for costs incurred in connection with any criminal, civil or administrative proceeding (including filing of a false certification) commenced by the federal government, or a state, local or foreign government:</p> <p>a. Did these costs relate to a violation of, or failure to comply with, a Federal, State, local or foreign statute or regulation, by the institution (including its agents and employees) which resulted in any of the following dispositions?</p> <p>(i) In a criminal proceeding, a conviction?</p> <p>(ii) In a civil or administrative proceeding involving an allegation of fraud or similar misconduct, a determination of institutional liability?</p> <p>(iii) In the case of any civil or administrative proceeding, the imposition of a monetary penalty?</p> <p>(iv) A final decision by an appropriate federal official to debar or suspend the institution, to rescind or void an award, or to terminate an award for default by reason of a violation or failure to comply with a law or regulation?</p> <p>(v) A disposition by consent or compromise, if the action could have resulted in any of the dispositions described in 1 through 4 above?</p> <p>b. Are the costs reasonable in relation to the activities required to deal with the proceeding and the underlying cause of action?</p> <p>c. Was payment of the costs incurred, as allowable and allocable costs, not prohibited by any other provision(s) of the sponsored agreement?</p> <p>d. Were costs not otherwise recovered from the federal government or a third party, either directly as a result of the proceeding or otherwise?</p> <p>e. Were costs incurred by the institution in connection with the defense of suits brought by its employees or ex-employees under section 2 of the Major Fraud Act of 1988 (Pub. L. 100-700) (including the cost of all relief necessary to make such employee whole) where the institution was found liable or settled?</p> <p>f. Against federal government claims or appeals, or the prosecution of claims or appeals against the federal government?</p> <p>g. Were costs of legal, accounting, consultant services and related costs, incurred in connection with patent infringement litigation?</p>		
<p>14) Depreciation and use allowances</p>	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<ol style="list-style-type: none"> 1. Were federal funds expended as compensation for use of buildings, capital improvements, and equipment that is used, needed in the institution's activities, and properly allocable to sponsored agreements? 2. Was the computation of depreciation or use allowances based on the acquisition cost of the assets involved? 3. Are the charges for use allowances or depreciation supported by adequate property records, and physical inventories that are taken at least once every two years to ensure that the assets exist and are usable, used and needed? 4. If the depreciation method is used, does the institution maintain adequate depreciation records showing the amount of depreciation taken each period? 		
15) Donations and contributions	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for contributions or donations (including cash, property, and services) made by the institution? 2. Were donated services or property received by the institution? (The value of the donated services and property is not reimbursable but may be used to meet cost-sharing or matching requirements in accordance with OMB Circular A-110.) 		
16) Employee morale, health and welfare costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for the costs of employee information publications, health or first-aid clinics and/or infirmaries, recreational activities, employee counseling services, and any other expenses incurred in accordance with the institution's established practice or custom for the improvement of working conditions, employer-employee relations, employee morale, and employee performance? 2. Were such costs equitably apportioned to all activities of the institution? 3. Was income generated from any of these activities credited to the cost of these activities (unless such income has been irrevocably set over to employee welfare organizations)? 4. Were federal funds expended to cover losses resulting from the operation of food services? <ol style="list-style-type: none"> a. Was the institution's objective to operate such services on a break-even basis? b. Were losses sustained because of operating objectives other than the above? c. Were these losses due to unusual circumstances? d. Were these operating objectives approved by the USDOE? 		
17) Entertainment costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities)? 		
18) Equipment and other capital expenditures	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<ol style="list-style-type: none"> 1. Were federal funds expended for general purpose equipment (office equipment, furnishings, modular offices, telephone networks, IT equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles), buildings, and land as direct charges and approved in advance by FDOE? 2. Were federal funds expended for capital expenditures for special purpose equipment with a unit cost of \$5000 or more as direct charges? <ol style="list-style-type: none"> a) Were these charges approved in advance by FDOE? 3. Were federal funds expended for capital expenditures for improvements to land, buildings or equipment which materially increase their value or useful life? <ol style="list-style-type: none"> a) Were these charges approved in advance by FDOE? 4. When approved as a direct charge, were these capital expenditures charged in the period in which the expenditure was incurred (or as otherwise determined appropriate by and negotiated with the FDOE)? 5. Were federal funds expended for equipment and other capital expenditures as indirect costs? 				
19) Fines and penalties		<input type="checkbox"/>	<input type="checkbox"/>	
<ol style="list-style-type: none"> 1. Were federal funds expended to cover costs resulting from violations of, or failure of the institution to comply with federal, state and local or foreign laws and regulations? <ol style="list-style-type: none"> a. Were these costs incurred as a result of compliance with specific provisions of the sponsored agreement? b. Were these payments authorized in advance through instructions in writing from the authorized official? 				
20) Fund-raising and investment management costs		<input type="checkbox"/>	<input type="checkbox"/>	
<ol style="list-style-type: none"> 1. Were federal funds expended to cover costs of organized fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions? 2. Were federal funds expended to cover costs of investment counsel and staff and similar expenses incurred solely to enhance income from investments? 3. Were federal funds expended for costs related to the physical custody and control of monies and securities? 				
21) Gains and losses on depreciable assets				
<ol style="list-style-type: none"> 1. Were gains and losses on the sale, retirement or other disposition of depreciable property included in the year in which they occur as credits or charges to the asset cost grouping(s) in which the property was included? 2. When assets acquired with federal funds, in part or wholly, were disposed of, was the distribution of the proceeds made in accordance with OMB Circular A-110, "Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations?" 				

22) Goods or services for personal use	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs of goods or services for personal use of the institution's employees? 2. Were these costs reported as taxable income to the employees? 		
23) Housing and personal living expenses	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs of housing (such as depreciation, maintenance, utilities, furnishings, rent), housing allowances and personal living expenses for/of the institution's current or past officers? 2. Were these costs reported as taxable income to the employees? 		
24) Idle facilities (completely unused facilities) and idle capacity (unused capacity of partially used facilities)	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for "cost of idle facilities or idle capacity" such as maintenance, repair, housing, rent and other related costs such as insurance, interest, property taxes and depreciation or use allowances? 2. Were the costs of idle facilities necessary to meet fluctuations in workload? 3. Were facilities idle due to changes in program requirements, efforts to achieve more economical operations, reorganization, and termination or due to unforeseen reasons? 4. Have the facilities been idle longer than one year? 5. Were federal funds expended for "cost of idle facilities or idle capacity" such as maintenance, repair, housing, rent and other related costs such as insurance, interest, property taxes and depreciation or use allowances? 6. Were the costs of idle capacity normal costs of doing business and a factor in the normal fluctuations of usage from period to period? 		
25) Insurance and indemnification	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were the costs of insurance required or approved and maintained as required by the federal award? 2. Were federal funds expended for costs of other insurance maintained by the institution in connection with the general conduct of its activities? <ol style="list-style-type: none"> a. Were the types, extent and cost of coverage in accordance with sound institutional practices? b. Were the costs for insurance or of any contributions to any reserve covering the risk of loss or damage to federally owned property? c. Were the costs for life insurance for officers or trustees? 3. Were the costs associated with a self-insurance program? 4. Were the costs for actual losses which could have been covered by other insurance? 5. Were these costs for deductibles or minor losses not covered by insurance, such as the spoilage, breakage and disappearance of small hand tools? 6. Were the costs for indemnification, securing the institution against liabilities to third persons and other losses not compensated by insurance, and expressly provided for in the sponsored agreement? 7. Were the costs to provide insurance against defects in the institution's materials or workmanship? 8. Were the costs for malpractice insurance for research programs involving human subjects? 		

26) Interest	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred for interest on borrowed capital, temporary use of endowment funds, or the use of the institution's own funds? 2. Were federal funds expended for interest on debt incurred after July 1, 1982 to acquire buildings, major reconstruction and remodeling, or the acquisition or fabrication of capital equipment costing \$10,000 or more? 3. Were federal funds expended for interest on debt incurred after May 8, 1996 to acquire or replace capital assets (including construction, renovations, alterations, equipment, land and capital assets acquired through capital leases) acquired after that date and used in support of sponsored agreements, subject to conditions? 		
27) Labor relations costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were Federal funds expended for costs incurred in maintaining satisfactory relations between the institution and its employees, including costs of labor management committees, employees' publications, and other related activities? 		
28) Lobbying	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for any of the following activities? <ol style="list-style-type: none"> a. Attempts to influence the outcomes of any federal, state or local election, referendum, initiative, or similar procedure, through in kind or cash contributions, endorsements, publicity, or similar activity? b. Establishing, administering, contributing to, or paying the expenses of a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcomes of elections? c. Any attempt to influence the introduction of federal or state legislation? d. Any attempt to influence the enactment or modification of any pending federal or state legislation through communication with any member or employee of the Congress or state Legislature, including efforts to influence state or local officials to engage in similar lobbying activity? e. Any attempt to influence any government official or employee in connection with a decision to sign or veto enrolled legislation? f. Any attempt to influence the enactment or modification of any pending federal or state legislation by preparing, distributing, or using publicity or propaganda, or by urging members of the general public, or any segment thereof, to contribute to or participate in any mass demonstration, march, rally, fundraising drive, lobbying campaign or letter writing or telephone campaign? g. Legislative liaison activities, including attendance at legislative sessions or committee hearings, gathering information regarding legislation, and analyzing the effect of legislation, when such activities are carried on in support of or in knowing preparation for an effort to engage in unallowable lobbying? h. Executive lobbying costs incurred in attempting to improperly influence either directly or indirectly, an employee or officer of the executive branch of the federal government to give consideration or to act regarding a sponsored agreement or a regulatory matter? 		

<p>2. Were federal funds expended on the following activities?</p> <p>a. Technical and factual presentations on topics directly related to the performance of a grant, contract, or other agreement, in response to a documented request made by the recipient member, legislative body or subdivision, or a cognizant staff member thereof, provided such information is readily obtainable and can be readily put in deliverable form, and further provided that costs under this section for travel, lodging or meals are unallowable unless incurred to offer testimony at a regularly scheduled Congressional hearing pursuant to a written request for such presentation made by the chairman or ranking minority member of the committee or subcommittee conducting such hearings?</p> <p>b. Any lobbying made unallowable by subsection a. (3) to influence state legislation in order to directly reduce the cost, or to avoid material impairment of the institution's authority to perform the grant, contract, or other agreement?</p> <p>c. Any activity specifically authorized by statute to be undertaken with funds from the grant, contract, or other agreement?</p> <p>3. Were lobbying costs separately identified in the F&A (facilities and administrative) cost rate proposal?</p> <p>4. Was a certification that the requirements and standards of this section (lobbying) submitted as part of the annual F&A cost rate proposal?</p> <p>5. Has the institution maintained adequate records to demonstrate that the determination of costs as being allowable or unallowable pursuant to this section complies with the requirements of OMB Circular A-21?</p>			<input type="checkbox"/>	<input type="checkbox"/>
29) Losses on other sponsored agreements or contracts		<input type="checkbox"/> YES	<input type="checkbox"/> NO	
<p>1. Were federal funds expended for any excess of costs over income under any other sponsored agreement or contract of any nature? (This includes, but is not limited to, the institution's contributed portion by reason of cost-sharing agreements or any under-recoveries through negotiation of flat amounts for F&A costs.)</p>			<input type="checkbox"/>	<input type="checkbox"/>
30) Maintenance and repair costs		<input type="checkbox"/> YES	<input type="checkbox"/> NO	
<p>1. Were federal funds expended for costs incurred for necessary maintenance, repair, or upkeep of buildings and equipment (including federal property unless otherwise provided for) which neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in an efficient operating condition? Costs incurred for improvements which add to the permanent value of the buildings and equipment or appreciably prolong their intended life shall be treated as capital expenditures.</p>			<input type="checkbox"/>	<input type="checkbox"/>
31) Materials and supplies costs		<input type="checkbox"/> YES	<input type="checkbox"/> NO	
<p>1. Were federal funds expended for costs incurred for materials, supplies, and fabricated parts necessary to carry out a sponsored agreement?</p> <p>2. Were purchased materials and supplies charged at their actual prices, net of applicable credits? (Withdrawals from general stores or stockrooms should be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs.)</p> <p>3. Were materials and supplies used for the performance of a sponsored agreement charged as direct costs?</p> <p>4. Was there a charge for federally-donated or furnished materials that are used in performing the sponsored agreement?</p>			<input type="checkbox"/>	<input type="checkbox"/>

32) Meetings and conferences	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for the costs of meetings and conferences, the primary purpose of which is the dissemination of technical information? (This includes costs of meals, transportation, rental of facilities, speakers' fees and other items incidental to meetings or conferences.)		
33) Memberships, subscriptions and professional activity costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs of the institution's membership in business, technical and professional organizations? 2. Were federal funds expended for costs of the institution's subscriptions to business, professional and technical periodicals? 3. Were federal funds expended for costs of the institution's membership in any civic or community organization? 4. Were federal funds expended for costs of membership in any country club or social or dining club or organization?		
34) Patent costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for any of the following activities? a. Cost of preparing disclosures, reports, and other documents required by the sponsored agreement and of searching the art to the extent necessary to make such disclosures? b. Cost of preparing documents and any other patent costs in connection with the filing and prosecution of a United States patent application where title or royalty-free license is required by the federal government to be conveyed to the federal government? c. General counseling services relating to patent and copyright matters, such as advice on patent and copyright laws, regulations, clauses and employee agreements? d. Cost of preparing disclosures, reports and other documents and of searching the art to the extent necessary to make disclosures not required by the award? e. Costs in connection with filing and prosecuting any foreign patent application, or any United States patent application, where the sponsored agreement does not require conveying title or a royalty-free license to the federal government?		
35) Plant and homeland security costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for any of the following activities: a. Necessary and reasonable expenses incurred for routine and homeland security to protect facilities, personnel, and work products? b. Wages and uniforms of personnel engaged in security activities, equipment, barriers, contractual security services and consultants?		
36) Pre-agreement costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended on costs incurred prior to the effective date of the sponsored agreement, whether or not they would have been allowable if incurred after the effective date?		

37) Professional service costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for the costs of professional and consultant services tendered by persons who are members of a particular profession or possess a special skill who are not officers or employees of the institution? 2. Could the service have been performed more economically by direct employment rather than contracting?		
38) Proposal costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended on proposal costs that were reasonable and equitable? Explain.		
39) Publication and printing costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended on publication and printing costs identifiable with a particular cost objective? 2. If not, were they allocated as indirect costs to all benefiting activities of the institution? 3. If Federal funds were expended for page charges for professional journal publications as a necessary part of research costs, did the research papers report work supported by the federal government? 4. Are the charges levied impartially on all research papers published by the journal, whether or not by federally-sponsored authors?		
40) Re-arrangement and alteration costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs incurred for ordinary or normal rearrangement and alteration of facilities? 2. If special arrangements and alteration costs were incurred specifically for the project, was prior approval granted by the USDOE?		
41) Reconversion costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs incurred in the restoration or rehabilitation of the institution's facilities to approximately the same condition existing immediately prior to the commencement of a sponsored agreement? 2. Were Federal funds expended to cover the cost of wear and tear on the institution's facilities?		
42) Recruiting costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs incurred pursuant to a well-managed recruitment program to recruit staff in keeping with workload requirements? (These costs include: "help wanted" advertising, operating costs of an employment office necessary to secure and maintain an adequate staff, costs of operating an aptitude and educational testing program, travel costs of employees while engaged in recruiting personnel, travel costs of applicants for interviews for prospective employment and relocation costs incurred incident to recruitment of new employees.) 2. Did the institution use employment agencies that charged standard commercial rates? 3. In publications, did help-wanted advertising include color, material other than for recruitment purposes, or excessive size? 4. Do recruiting enticements meet the test of reasonableness and conform to the established practices of the institution? 5. Has the institution refunded or credited relocation costs when the costs were incurred incidental to the recruitment of a new employee who resigned for reasons within his control within 12 months of hire?		
43) Rental costs of buildings and equipment	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<p>1. Are rental costs reviewed periodically to determine reasonableness? (Based on rental costs of comparable property, market conditions in the area, alternatives available, type, life expectancy, condition and value of the property leased.)</p> <p>2. Are rental costs under "sale and lease back" and "less-than-arms-length" leases equal to the amounts that would have been allowed had title to the property been held by the institution?</p>		
44) Royalties and other costs for the use of patents	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Does the federal government have a license or the right to free use of the patent or copyright?</p> <p>2. Has the patent or copyright been adjudicated invalid or administratively determined to be invalid?</p> <p>3. Has the patent or copyright been considered to be unenforceable?</p> <p>4. Has the patent or copyright expired?</p> <p>5. Does the institution have a process to determine reasonableness of royalties and other costs for the use of patents?</p>		
45) Scholarships and student aid costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for costs of scholarships, fellowships and other programs of student aid to provide training to selected participants and the charge was approved by the sponsoring agency?</p> <p>2. Were the tuition remission and other forms of compensation paid as, or in lieu of, wages to students performing necessary work or conducting activities necessary to the sponsored agreement?</p> <p>3. Were these forms of compensation provided in accordance with established institutional policy?</p> <p>4. Was the tuition or other payments reasonable compensation for the work performed?</p>		
46) Selling and marketing costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for costs of selling and marketing any products or services of the institution?</p>		
47) Specialized service facilities	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for costs of services provided by highly specialized facilities operated by the institution, such as computers, wind tunnels, and reactors?</p>		
48) Student activity costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for costs incurred for intramural activities, student publications, student clubs and other student activities?</p> <p style="padding-left: 20px;">a. Were these costs provided for in the sponsored agreement?</p>		

49) Taxes	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for payments, in lieu of taxes, which are commensurate with the local government services received? 2. Were these payments for taxes from which exemptions are available to the institution directly or which are available to the institution based on an exemption afforded the federal government? 3. Were these payments for special assessments on land which represent capital improvements? 4. Were refunds of taxes, interest, or penalties, and any payment to the institution of interest thereon, attributable to taxes, interest, or penalties which were allowed as sponsored agreement costs, credited or paid to the federal government in the manner directed by the federal government?		
50) Termination costs applicable to sponsored agreements	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. If an award has been terminated, were there certain costs that could not be discontinued immediately after the effective date of termination?		
51) Training costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for the cost of training provided for employee development?		
52) Transportation costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs incurred for freight, express, cartage, postage, and other transportation services relating either to goods purchased, in process, or delivered? 2. Does the institution follow a consistent, equitable procedure where identification with the materials received cannot readily be made, so that inbound transportation cost may be charged to the appropriate F&A cost accounts? 3. Is outbound freight, if reimbursable under the terms of the sponsored agreement, treated as a direct cost?		
53) Travel costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were all travel expenses (paid from these federal funds) incurred for the official business of the institution? 2. Are all travel charges consistent with the institution's written travel policy? 3. Are all airfare costs coach or equivalent unless they meet the exceptions in OMB Circular A-21? 4. If institution staff travels by other than commercial carrier, are the travel charges consistent with available commercial charges?		
54) Trustees	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for travel and subsistence costs of trustees (or directors)? These costs are subject to restrictions regarding lodging, subsistence and air travel costs provided in Section 53, OMB Circular A-21.		

**SECTION 6 – ALLOWABLE COSTS-PROTOCOL
NON-PROFIT ORGANIZATIONS**

Provider:	Date:	Position Interviewed:	Monitor:
Fiscal - Allowable/Unallowable Costs - Non-Profit Organizations			
Statutory Authority: OMB Circular A-122, "Cost Principles for Non-Profit Organizations;" OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations"			
Directions: Did your agency spend federal grant funds on any of the <u>numbered</u> items below? Check YES or NO . If the answer is YES , find that numbered item in the following pages and answer the questions for that section.			

Selected Item of Cost	YES	NO	Selected Item of Cost	YES	NO
1) Advertising and public relations costs			27) Maintenance and repair costs		
2) Advisory councils			28) Materials and supplies costs		
3) Alcoholic beverages			29) Meetings and conferences		
4) Audit costs and related services			30) Memberships, subscriptions and professional activity costs		
5) Bad debts			31) Organization costs		
6) Bonding costs			32) Page charges in professional journals		
7) Communication costs			33) Participant support costs		
8) Compensation for personal services (including but not necessarily limited to wages, salaries, and fringe benefits)			34) Patent costs		
9) Contingency provisions			35) Plant and homeland security costs		
10) Defense and prosecution of criminal and civil proceedings and claims			36) Pre-agreement costs		
11) Depreciation and use allowances			37) Professional services costs		
12) Donations and contributions			38) Publication and printing costs		
13) Employee morale, health and welfare costs			39) Rearrangement and alteration costs		
14) Entertainment costs			40) Reconversion costs		
15) Equipment and other capital expenditures			41) Recruiting costs		
16) Fines and penalties			42) Relocation costs		
17) Fund-raising and investment management costs			43) Rental costs of buildings and equipment		
18) Gains and losses on depreciable assets			44) Royalties and other costs for uses of patents and copyrights		
19) Goods or services for			45) Selling and marketing		

personal use			costs		
20) Housing and personal living expenses			46) Specialized service facilities		
21) Idle facilities and idle capacity (unused capacity of partially used facilities)			47) Taxes		
22) Insurance and indemnification			48) Termination costs applicable to sponsored agreements		
23) Interest			49) Training costs		
24) Labor relations costs			50) Transportation costs		
25) Lobbying			51) Travel costs		
26) Losses on other sponsored agreements or contracts			52) Trustees		

Provider:	Date:	Position Interviewed:	Monitor:	
Fiscal - Allowable/Unallowable Costs - Non-Profit Organizations				
<p>Statutory Authority: OMB Circular A-122, "Cost Principles for Non-Profit Organizations;" OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations"</p> <p>Directions: Did your agency spend federal grant funds on any of the numbered items below? Check YES or NO. If the answer is YES, answer the questions for that section. Response or verification should be provided in the space following the inquiry; spaces expand to accommodate explanation.</p>				
1) Advertising and public relations costs			<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Did the agency advertise teaching vacancies? In what media? Were Perkins IV or Adult Education funds used to purchase the advertisements? 2. What other ads did the agency purchase? In what media? 3. Did the agency use Perkins IV or Adult Education funds to cover costs of meetings or conventions? Displays, demonstrations, or exhibits? Meeting rooms, hospitality suites, booths or other special facilities? 4. Did Perkins IV or Adult Education funding provide salaries and wages for employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings? 5. Were Federal funds used to cover costs of promotional items and memorabilia, including models, gifts, and souvenirs? 6. Were the agency's advertising and public relations costs designed to promote the agency's programs or the agency itself? 				
2) Advisory councils			<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds used to cover any costs related to advisory councils? 				
3) Alcoholic beverages			<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for the costs of alcoholic beverages? 				
4) Audit costs and related services			<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for audit costs and related expenses such as audits required by, and performed in accordance with, the Single Audit Act? 				

5) Bad debts	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended to cover bad debts, including losses (whether actual or estimated) arising from uncollectable accounts and other claims, related collection costs, and related legal costs?		
6) Bonding costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for bonding costs required by the federal government as assurance against financial loss to itself, including such bonds as bid, performance, payment, advance payment, infringement, and fidelity bonds?		
2. Are bonding costs required in the general conduct of operations of the agency?		
7) Communication costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for telephone services, local and long distance telephone calls, telegrams, postage, messenger, electronic or computer transmittal services?		
8) Compensation for personal services	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. How do you document salaries and wages charged to federal grants?		
2. Is the total compensation reasonable for the services rendered? Does it conform to the established policy of the agency consistently applied to both federal and non-federal activities?		
3. Who approves payroll?		
4. Certifications that the employees worked solely on that program for the period covered by the certification?		
a. Were these certifications prepared at least semi-annually and signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee?		
5. Where employees work on multiple activities or cost objectives, was a distribution of their salaries or wages supported by personnel activity reports (PARs)?		
a. Do these PARs reflect an after-the-fact distribution of the actual activity of each employee?		
b. Do they account for the total activity for which each employee is compensated?		
c. Are they prepared at least monthly and coincide with one or more pay periods?		
d. Are they signed by the employee?		
e. Do they reflect budget estimates or other distribution percentages determined before the services are performed? If so, they do not qualify as support for charges to federal awards.		
6. If federal funds have been expended for severance pay:		
a. Was severance pay required by law, by employee/employer agreement or by established written policy?		
b. Was severance pay associated with normal turnover and allocated as an indirect cost?		

9) Contingency provisions	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended as contributions to a contingency reserve or any similar provision made for events the occurrence of which cannot be foretold with certainty as to time, intensity, or with an assurance of their happening? (The term "contingency reserve" excludes self-insurance reserves, pension plan reserves, and post-retirement health and other benefit reserves computed using acceptable actuarial cost methods.)		
10) Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringement	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs incurred for the defense and/or prosecution of criminal and/or civil proceedings, claims, appeals, and patent infringement? Explain.		
11) Depreciation and use allowances	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended as compensation for use of buildings, capital improvements, and equipment that is used, needed in the non-profit organization's activities, and properly allocable to federal awards? 2. Was the computation of depreciation or use allowances based on the acquisition cost of the assets involved? 3. Are the charges for use allowances or depreciation supported by adequate property records and physical inventories that are taken at least once every two years to ensure that the assets exist and are usable, used and needed? 4. If the depreciation method is used, does the non-profit organization maintain adequate depreciation records showing the amount of depreciation taken each period?		
12) Donations and contributions	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for contributions or donations (including cash, property, and services) made by the non-profit organization? 2. Were donated services or property received by the non-profit organization? (The value of the donated services and property is not reimbursable but may be used to meet cost-sharing or matching requirements in accordance with OMB Circular A-110.)		
13) Employee morale, health and welfare costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for the costs of employee information publications, health or first-aid clinics and/or infirmaries, recreational activities, employee counseling services, and any other expenses incurred in accordance with the school district's established practice or custom for the improvement of working conditions, employer-employee relations, employee morale and employee performance? a. Were such costs equitably apportioned to all activities of the agency? b. Was income generated from any of these activities offset against expenses?		
14) Entertainment costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation and gratuities)?		
15) Equipment and other capital expenditures	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<ol style="list-style-type: none"> 1. Were federal funds used for capital expenditures for general purpose equipment, buildings and land as direct charges? <ol style="list-style-type: none"> a. Were these expenditures approved in advance by the awarding agency (FDOE)? 2. Were federal funds expended for capital expenditures for special purpose equipment with a unit cost of \$5000 or more as direct charges? <ol style="list-style-type: none"> a. Were these charges approved in advance by FDOE? 3. Were federal funds expended for capital expenditures for improvements to land, buildings, or equipment which materially increase their value or useful life? <ol style="list-style-type: none"> a. Were these charges approved in advance by the FDOE? 4. When approved as a direct charge, were these capital expenditures charged in the period in which the expenditure was incurred (or as otherwise determined appropriate by and negotiated with the FDOE)? 5. Were federal funds expended for equipment and other capital expenditures and charged as indirect costs? 				
16) Fines and penalties	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
<ol style="list-style-type: none"> 1. Were federal funds expended to cover costs resulting from violations of, or failure of the non-profit organization to comply with federal, state, and local laws and regulations? <ol style="list-style-type: none"> a. Were these costs incurred as a result of compliance with specific provisions of the federal award? b. Were these payments authorized in advance through instructions in writing from the awarding agency? 				
17) Fundraising and investment management costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
<ol style="list-style-type: none"> 1. Were federal funds expended to cover costs of organized fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests and similar expenses incurred solely to raise capital or obtain contributions? 2. Were federal funds expended to cover costs of investment counsel and staff and similar expenses incurred solely to enhance income from investments? 3. Were federal funds expended for costs related to the physical custody and control of monies and securities? 				
18) Gains and losses on depreciable assets	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
<ol style="list-style-type: none"> 1. Were gains and losses on the sale, retirement or other disposition of depreciable property included in the year in which they occur as credits or charges to the asset cost grouping(s) in which the property was included? 				
19) Goods or services for personal use	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
<ol style="list-style-type: none"> 1. Were federal funds expended for costs of goods or services for personal use of the non-profit organization's employees? 2. Were these costs reported as taxable income to the employees? 				
20) Housing and personal living expenses	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
<ol style="list-style-type: none"> 1. Were federal funds expended for costs of housing (such as depreciation, maintenance, utilities, furnishings, rent), housing allowances and personal living expenses for/of the non-profit organization's current or past officers or employees? 2. Were these costs reported as taxable income to the employees? 				
21) Idle facilities (completely unused facilities) and idle capacity (unused capacity of partially used facilities)	<input type="checkbox"/> YES	<input type="checkbox"/> NO		

<ol style="list-style-type: none"> 1. Were the costs of idle facilities (maintenance, repair, housing, rent and other related costs such as insurance, interest, property taxes and depreciation or use allowances) necessary to meet fluctuations in workload? 2. Were facilities idle due to changes in program requirements, efforts to achieve more economical operations, reorganization, and termination or due to unforeseen reasons? 3. Have the facilities been idle longer than one year? 4. Were federal funds expended for "cost of idle capacity" such as costs for maintenance, repair, housing, rent and other related costs such as insurance, interest, property taxes and depreciation or use allowances? 5. Were the costs of idle capacity normal costs of doing business and a factor in the normal fluctuations of usage from period to period? 			
22) Insurance and indemnification		<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs of insurance required or approved, and maintained, pursuant to the federal award? 2. Were federal funds expended for costs of other insurance maintained by the non-profit organization in connection with the conduct of its activities? <ol style="list-style-type: none"> a. Were the types and extent and cost of coverage in accordance with sound business practices? b. Were the costs for insurance or of any contributions to any reserve covering the risk of loss or damage to federally owned property? c. Were the costs for life insurance for officers or trustees? d. Were the costs associated with a self-insurance program? e. Were the costs for actual losses which could have been covered by permissible insurance? f. Were these costs for deductibles or minor losses not covered by insurance, such as the spoilage, breakage and disappearance of supplies or small hand tools? g. Were the costs for indemnification, securing the non-profit organization against liabilities to third persons and other losses not compensated by insurance, and expressly provided for in the federal award? h. Were the costs to provide insurance against defects in the non-profit organization's materials or workmanship? 			
23) Interest		<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred for interest on borrowed capital, temporary use of endowment funds or the use of the non-profit organization's own funds? 2. Were federal funds expended for interest on debt incurred after September 29, 1995 to acquire or replace capital assets (including renovations, alterations, equipment, land, and capital assets acquired through capital leases) and used in support of Federal awards? 3. Were the costs related to interest attributable to fully depreciated assets? 4. Do the costs to acquire facilities and equipment reflect a fair market value available to the non-profit organization from an unrelated ("arm's length") third party? 			
24) Labor relations costs		<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ol style="list-style-type: none"> 1. Were federal funds expended for costs incurred in maintaining satisfactory relations between the non-profit organization and its employees, including costs of labor management committees, employees' publications and other related activities? 			
25) Lobbying		<input type="checkbox"/> YES	<input type="checkbox"/> NO

<p>1. Were federal funds expended for any of the following activities?</p> <p>a. Attempts to influence the outcomes of any federal, state, or local election, referendum, initiative or similar procedure, through in kind or cash contributions, endorsements, publicity, or similar activity?</p> <p>b. Establishing, administering, contributing to, or paying the expenses of a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcomes of elections?</p> <p>c. Any attempt to influence the introduction of federal or state legislation through:</p> <p>i. Communication with any member or employee of the Congress or state Legislature, including efforts to influence state or local officials to engage in similar lobbying activity?</p> <p>ii. Preparing, distributing or using publicity or propaganda, or by urging members of the general public to contribute to or participate in any mass demonstration, march, rally, fundraising drive, lobbying campaign or letter writing or telephone campaign?</p> <p>d. Legislative liaison activities, including attendance at legislative sessions or committee hearings, gathering information regarding legislation, and analyzing the effect of legislation, when such activities are carried on in support of or in knowing preparation for an effort to engage in unallowable lobbying?</p> <p>e. Executive lobbying costs incurred in attempting to improperly influence either directly or indirectly, an employee or officer of the Executive Branch of the federal government to give consideration or to act regarding a sponsored agreement or a regulatory matter?</p> <p>2. Were federal funds expended on the following activities?</p> <p>a. Technical and factual presentations on topics directly related to the performance of a grant, contract or other agreement in response to a documented/written request made by the recipient member, legislative body or subdivision, or a cognizant staff member, provided such information is readily obtainable and can be readily put in deliverable form?</p> <p>b. Any lobbying made unallowable by subsection a. (3) of OMB Circular A-122 to influence State legislation in order to directly reduce the cost, or to avoid material impairment of the non-profit organization's authority to perform the grant, contract, or other agreement?</p> <p>c. Any activity specifically authorized by statute to be undertaken with funds from the grant, contract, or other agreement?</p> <p>3. Were lobbying costs separately identified in the indirect cost rate proposal?</p> <p>4. Was a certification that the requirements and standards of this section (lobbying) submitted as part of the annual indirect cost rate proposal?</p> <p>5. Has the organization maintained adequate records to demonstrate that the determination of costs as allowable or unallowable is pursuant to this section of OMB Circular A-122?</p>				
26) Losses on other sponsored agreements or contracts	<input type="checkbox"/> YES	<input type="checkbox"/> NO		
<p>1. Were federal funds expended for any excess of costs over income under any other federal award? This includes, but is not limited to; the non-profit organization's contributed portion by reason of cost-sharing agreements or any under-recoveries through negotiation of lump sums for, or ceilings on, indirect costs.</p>				
27) Maintenance and repair costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO		

<p>1. Were federal funds expended for costs incurred for necessary maintenance, repair or upkeep of buildings and equipment (including federal property unless otherwise provided for) which neither add to the permanent value of the property nor appreciably prolong its intended life, but keep it in an efficient operating condition? Costs incurred for improvements which add to the permanent value of the buildings and equipment or appreciably prolong their intended life shall be treated as capital expenditures.</p> <p>2. Were purchased materials and supplies charged at their actual prices, net of applicable credits? Withdrawals from general stores or stockrooms should be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs.</p> <p>3. Were materials and supplies actually used for the performance of a federal award and charged as direct costs?</p> <p>4. Was there a charge for federally-donated or furnished materials used in performing the federal award?</p>		
28) Meetings and conferences	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for the costs of meetings and conferences, the primary purpose of which is the dissemination of technical information? (This includes costs of meals, transportation, rental of facilities, speakers' fees, and other items incidental to such meetings or conferences.)</p>		
29) Memberships, subscriptions and professional activity costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for costs of the non-profit organization's membership in business, technical and professional organizations?</p> <p>2. Were federal funds expended for costs of the non-profit organization's subscriptions to business, professional and technical periodicals?</p> <p>3. Were federal funds expended for costs of membership in any civic or community organization?</p> <p>4. Were federal funds expended for costs of membership in any country club or social or dining club or organization?</p>		
30) Organization costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Was approval obtained from the awarding agency prior to the expenditure of federal funds for any of the following? (Incorporation fees, brokers' fees, fees to promoters, organizers or management consultants; attorneys, accountants, or investment counselors, whether or not employees of the organization, in connection with establishment or reorganization of an organization.)</p>		
31) Page charges in professional journals	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for page charges for professional journal publications as a necessary part of research costs, where:</p> <p>a. The research papers report work supported by the federal government; and</p> <p>b. The charges are levied impartially on all research papers published by the journal, whether or not by federally-sponsored authors?</p>		
32) Participant support costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Was approval obtained from the awarding agency prior to the expenditure of federal funds for stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with meetings, conferences, symposia or training projects</p>		
33) Patent costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for any of the following activities?</p>		

<ul style="list-style-type: none"> a. Cost of preparing disclosures, reports, and other documents required by the federal award and of searching the art to the extent necessary to make such disclosures? b. Cost of preparing documents and any other patent costs in connection with the filing and prosecution of a United States patent application where title or royalty-free license is required by the federal government to be conveyed to the federal government? c. General counseling services relating to patent and copyright matters, such as advice on patent and copyright laws, regulations, clauses and employee agreements? <p>2. Were federal funds expended for any of the following activities?</p> <ul style="list-style-type: none"> a. Cost of preparing disclosures, reports, and other documents and of searching the art to the extent necessary to make disclosures not required by the award? b. Costs in connection with filing and prosecuting any foreign patent application, or any United States patent application, where the federal award does not require conveying title or a royalty-free license to the federal government? 		
34) Plant and homeland security costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for any of the following activities?</p> <ul style="list-style-type: none"> a. Necessary and reasonable expenses incurred for routine and homeland security to protect facilities, personnel and work products? b. Wages and uniforms of personnel engaged in security activities, equipment, barriers, contractual security services and/or consultants? 		
35) Pre-agreement costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended on costs incurred prior to the effective date of the federal award, whether or not they would have been allowable if incurred after the effective date?</p>		
36) Professional service costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ul style="list-style-type: none"> 1. Were federal funds expended for the costs of professional and consultant services tendered by persons who are members of a particular profession or possess a special skill who are not officers or employees of the non-profit organization? 2. Could the service have been performed more economically by direct employment rather than contracting? 		
37) Publication and printing costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ul style="list-style-type: none"> 1. Were federal funds expended on publication and printing costs identifiable with a particular cost objective? 2. If not, were they allocated as indirect costs to all benefitting activities of the non-profit organization? 3. If federal funds were expended for page charges for professional journal publications as a necessary part of research costs, did the research papers report work supported by the federal government? 4. Are the charges levied impartially on all research papers published by the journal, whether or not by federally-sponsored authors? 		
38) Re-arrangement and alteration costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<ul style="list-style-type: none"> 1. Were federal funds expended for costs incurred for ordinary or normal rearrangement and alteration of facilities? 2. Was prior approval granted by the awarding agency for special arrangements and alteration costs incurred specifically for the project? 		
39) Reconversion costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO

<p>1. Were federal funds expended for costs incurred in the restoration or rehabilitation of the non-profit organization's facilities to approximately the same condition existing immediately prior to the commencement of a federal award?</p> <p>2. Were federal funds expended to cover the cost of wear and tear on the non-profit organization's facilities?</p>		
40) Recruiting costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for costs incurred pursuant to a well-managed recruitment program to recruit staff in keeping with workload requirements? (These costs include: "help wanted" advertising, operating costs of an employment office necessary to secure and maintain an adequate staff, costs of operating an aptitude and educational testing program, travel costs of employees while engaged in recruiting personnel, travel costs of applicants for interviews for prospective employment, and relocation costs incurred incident to recruitment of new employees.)</p> <p>2. Did the non-profit organization use employment agencies that charged standard commercial rates?</p> <p>3. In publications, did help-wanted advertising include color, material other than for recruitment purposes or excessive size?</p> <p>4. Do recruiting enticements meet the test of reasonableness and conform to the established practices of the non-profit organization?</p> <p>5. Has the non-profit organization refunded or credited relocation costs when the costs were incurred incidental to the recruitment of a new employee who resigned for reasons within his control within 12 months of hire?</p>		
41) Relocation costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
42) Rental costs of buildings and equipment	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Are rental costs reviewed periodically to determine reasonableness? (based on rental costs of comparable property, market conditions in the area, alternatives available, type, life expectancy, condition and value of the property leased).</p> <p>2. Are rental costs under "sale and lease back" and "less-than-arms-length" leases equal to the amounts that would have been allowed had title to the property been held by the non-profit organization?</p>		
43) Royalties and other costs for the use of patents and copyrights	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Does the federal government have a license or the right to free use of the patent or copyright?</p> <p>2. Has the patent or copyright been adjudicated invalid or administratively determined to be invalid?</p> <p>3. Has the patent or copyright been considered to be unenforceable?</p> <p>4. Has the patent or copyright expired?</p> <p>5. Does the non-profit organization have a process to determine reasonableness of royalties and other costs for the use of patents?</p>		
44) Selling and marketing	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<p>1. Were federal funds expended for costs of selling and marketing any products or services of the non-profit organization that were not allowable as public relations costs?</p> <p>2. Was approval obtained from the awarding agency prior to the expenditure of federal funds for direct costs of selling and marketing any products and services of the non-profit organization when they are necessary for the performance of federal programs?</p>		
45) Specialized service facilities	<input type="checkbox"/> YES	<input type="checkbox"/> NO

1. Were federal funds expended for costs of services provided by highly specialized facilities operated by the non-profit organization, such as computers, wind tunnels and reactors?		
46) Taxes	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for taxes which the organization is required to pay and which are paid or accrued in accordance with Generally Accepted Accounting Principles (GAAP)? 2. Were federal funds expended for payments in lieu of taxes which are commensurate with the local government services received? 3. Were these payments for taxes from which exemptions are available to the non-profit organization directly or which are available to the non-profit organization based on an exemption afforded the federal government? 4. Were these payments for special assessments on land which represent capital improvements? 5. Which were allowed as sponsored agreement costs, credited or paid to the federal government in the manner directed by the federal government?		
47) Termination costs applicable to sponsored agreements	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. If an award has been terminated, were there certain costs that could not be discontinued immediately after the effective date of termination? 2. Is there evidence of a negligent or willful failure of the non-profit organization to discontinue such costs?		
48) Training costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO

1. Were Federal funds expended for any of the following costs?
 - a. Preparation and maintenance of a program of instruction? [Such as on-the-job, classroom, and apprenticeship training, designed to increase the vocational effectiveness of employees; including training materials, textbooks, salaries or wages of trainees (excluding overtime compensation which might arise), and
 - i. Salaries of the director of training and staff when the training program is conducted by the organization; or
 - ii. Tuition and fees when the training is in an institution not operated by the organization.]
 - b. Costs of part-time education, at an undergraduate or post-graduate college level, including that provided at the organization's own facilities? (allowable only when the course or degree pursued is relative to the field in which the employee is now working or may reasonably be expected to work, and are limited to:
 - i. Training materials and/or textbooks
 - ii. Fees charged by the educational institution
 - iii. Tuition charged by the educational institution or, in lieu of tuition, instructors' salaries and the related share of indirect costs of the educational institution to the extent that the sum thereof is not in excess of the tuition which would have been paid to the participating educational institution.
 - iv. Salaries and related costs of instructors who are employees of the organization.
 - v. Straight-time compensation of each employee for time spent attending classes during working hours not in excess of 156 hours per year and only to the extent that circumstances do not permit the operation of classes or attendance at classes after regular working hours; otherwise, such compensation is unallowable.
 - c. Costs of tuition, fees, training materials, and textbooks (but not subsistence, salary, or any other emoluments) in connection with full-time education, including that provided at the organization's own facilities, at a post-graduate (but not undergraduate) college level? (Allowable only when the course or degree pursued is related to the field in which the employee is now working or may reasonably be expected to work, and only where the costs receive the prior approval of the awarding agency.)
 - d. Costs of attendance of up to 16 weeks per employee per year at specialized programs specifically designed to enhance the effectiveness of executives or managers or to prepare employees for such positions? (These costs include enrollment fees; training materials; textbooks; and related charges; employees' salaries; subsistence; and travel. Costs allowable under this paragraph do not include those for courses that are part of a degree-oriented curriculum, which are allowable only to the extent set forth in ii and iii above.)
 - e. Maintenance expense, and normal depreciation or fair rental, on facilities owned or leased by the organization for training purposes?
 - f. Contributions or donations to educational or training institutions, including the donation of facilities or other properties, and scholarships or fellowships?
 - g. Training and education costs in excess of those otherwise allowable under subparagraphs ii and iii above with prior approval of FDOE? To be considered for approval, the organization must demonstrate that such costs are consistently incurred pursuant to an established training and education program, and that the course or degree pursued is relative to the field in which the employee is now working or may reasonably be expected to work.

49) Transportation costs

YES

NO

1. Were federal funds expended for costs incurred for freight, express, cartage, postage, and other transportation services relating either to goods purchased, in process or delivered?
2. Does the non-profit organization follow a consistent, equitable procedure where identification with the materials received cannot readily be made, so that inbound transportation cost may be charged to the appropriate indirect cost accounts?

50) Travel costs	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were all travel expenses (transportation, lodging, subsistence and related items) incurred for the official business of the organization? 2. Are all travel charges consistent with the non-profit organization's written travel policy? 3. Are all airfare costs coach or equivalent unless they meet the exceptions in OMB Circular A-122? 4. If organization staff travels by other than commercial carrier, are the travel charges consistent with commercial charges?		
51) Trustees	<input type="checkbox"/> YES	<input type="checkbox"/> NO
1. Were federal funds expended for travel and subsistence costs of trustees or directors? (These costs are subject to restrictions regarding lodging, subsistence and air travel costs provided in Section 31.)		

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