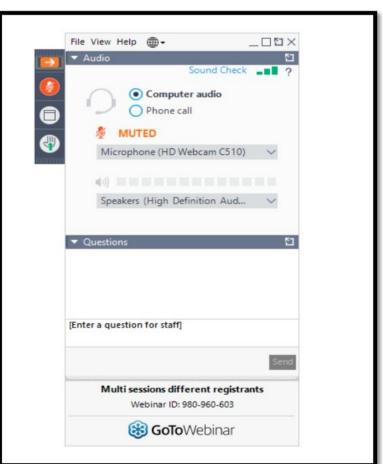


### Webinar Logistics

- Welcome and thank you for joining us
- We are recording this webinar
- PowerPoint presentation (pdf version) titled "Spring 2021
   Provider Training" is available at
   http://www.fldoe.org/academics/career-adult-edu/compliance
- All participants will be muted
- Please type your question in the question box







### **Provider Training Highlights**

This training will highlight the following:

- Fiscal Years and Programs Monitored
- Regulatory Requirements
- Risk Assessment
- Agencies selected for Spring 2021
- Monitoring Process and Reports
- Tools and Resources





### Purpose of the Webinar

- To provide participants with information regarding Quality Assurance and Compliance in the following areas:
  - Risk Assessment
  - Monitoring Strategies
  - Selected Providers, 2020-21
  - Areas of Focus



- Describe the pre-monitoring, desk review, and post-monitoring activities.
- Share examples of findings and concerns
- Answer general questions.





# Fiscal Years & Programs Monitored

#### Fiscal Years (FY) monitored:

2018-19, 2019-20 and 2020-21

#### **Grant Programs to be monitored:**

Adult Education (AE)

Carl D. Perkins (CTE)







### Regulatory Requirements

Federal and state requirement

○2 C.F.R. Part 200, Uniform Grant Guidance (link below)

http://www.ecfr.gov/cgi-bin/text-

idx?SID=704835d27377ef5213a51c149de40cab&node=2:1.1.2.2.1&rgn=div5

2 C.F.R. Part 200.61 and 200.62 (Internal Controls)

Workforce Innovation and Opportunity Act of 2014 (WIOA)

Carl D. Perkins - The Strengthening Career and Technical Education for the 21st Century Act (Perkins V)







## What is Our Way of Work?

#### Implementation of a risk-based system that is:

- Based on project and provider risk;
- Collaborative in nature;
- Recognizes positive practices;
- Identifies findings and concerns related to program quality and compliance; and
- Supports systemic and continuous program improvement





### Risk Assessment Factors 2020-21

Risk Matrix – Operational Risk Factors (Metrics)

- Adult Education Program Improvement Plan (AE only)
- Perkins Program Improvement Plan (CTE only)
- Change in Management Information System (MIS)
- Last monitoring review
- Amount of grants
- Total budget of all Perkins V or WIOA grants combined
- Number of grant funds remaining
- Audit/monitoring findings
- Change in director





### Risk Assessment Process

- Risk score divided into quartiles
- Balanced weight between data elements

Upper Quart	ile/High	ier	7
Upper Middle	e		5 :
Lower Middle	e.		3
Lower Quart	ile · · · ·	:	1
Zero	:	:	0





#### Risk Assessment Process

#### **Calculation of the Risk Score:**

Point Value Assigned X Weight = Total Metric Point

Sum of all Metric Points = Agency Risk Score

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





#### (Example) Risk Matrix for Colleges and School Districts

**Agency Name: Sunshine State College** 

#### **Carl D. Perkins Grants**

Target Year: 2018-2019 (Monitoring Year 2020-2021)

Metric	Scaling	Point Value	Point Value Assigned (PVA)	Weight	Total Metric Points (PVA X Weight)	
	7 or more years	7			, ,	
Number of Years Since the	5-6 Years	5	T _		50	
Agency Was Last Monitored	3-4 Years	3	5	X 10	50	
	0-2 Years	1				
	Upper Quartile	7		Weight		
Total Budget for all Perkins	Upper Middle	5		V 0	40	
Grants Combined	Lower Middle	3	5	X 8	40	
	Lower Quartile	1				
	4+	7				
Neural an of Banking Cuants	3	5		V 0	FC	
Number of Perkins Grants	2	3	7	X 8	50	
	1	1				
Change in Management	Yes	7				
Information System (MIS) from Previous Fiscal Year	No	0	0	X 6	0	
Agency CTF Program	per of Perkins Grants  1  Inge in Management mation System (MIS) Previous Fiscal Year  ency CTE Program ector Change from	7	7	X 6	42	
Director Change from Previous Fiscal Year	No	0		Α σ	72	
	Upper Quartile	7				
Use and defined for a sill	Upper Middle	5				
Unexpended Funds from all	Lower Middle	3	1	X 4	4	
Perkins Grants Combined	Lower Quartile	1				
	0	0				
	Upper Quartile	7				
	Upper Middle	5				
# OAG Audit Findings	Lower Middle	3	3	X 4	12	
	Lower Quartile	1				
	0	0				
			AGE	NCY RISK SCORE:	204	







## Spring 2021 VDMR Provider Selection

- Baker County SD
- Bradford County SD
- Collier County SD
- Columbia County SD
- Duval County SD
- Gadsden County SD
- Hamilton County SD
- Hendry County SD
- Liberty County SD
- Madison County SD

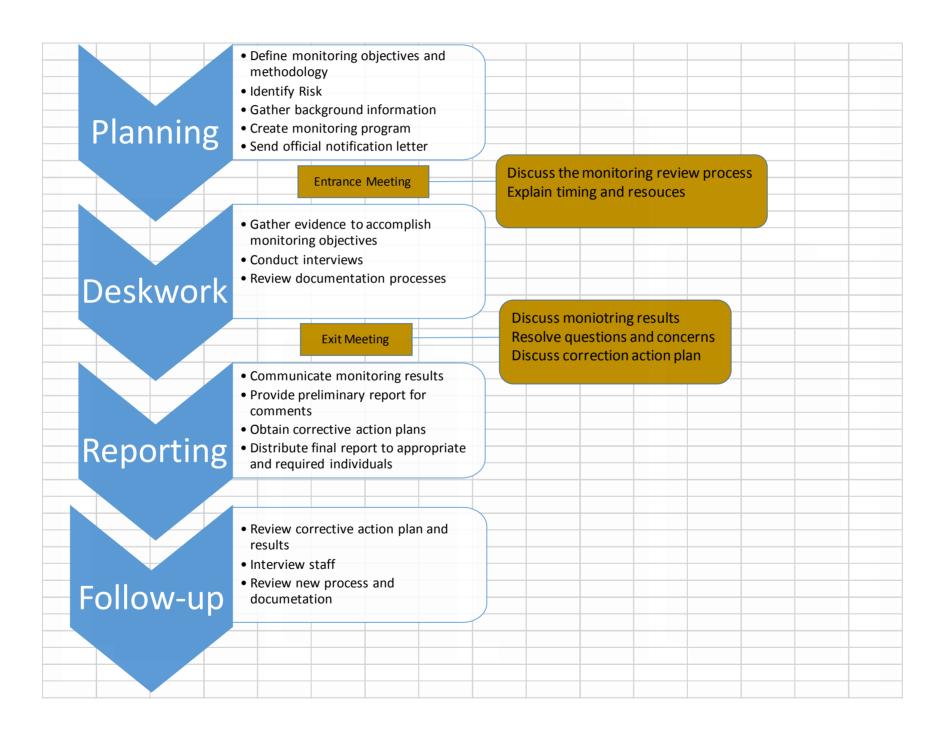
- Manatee County SD
- Martin County SD
- Monroe County SD
- Okeechobee County SD
- Pasco-Hernando State College
- Polk State College
- Putnam County SD
- Seminole County SD
- Union County SD
- Valencia College







### Flow Chart







# **Monitoring Strategies**

- Phone calls
- RFA / RFP reviews
- Records reviews
- Self-Assessment
- Technical assistance
- Program improvement plans

- Referral for fiscal review
- Referral for data review
- Verification activities
- Investigations
- On-site visit
- Desk review
- Corrective action plans





## **Pre-Monitoring Activities**

- Notification (personal and letter correspondence)
  - Personal contact with Director of program
  - Letter from Chancellor to Agency Head
  - Memorandum from Director of Quality Assurance and Compliance
- Conference calls
  - Training for providers (August and December)
  - Individual calls with providers
- Pre-visit meeting with FDOE staff





# **Pre-Monitoring Activities**

- Designation of agency contact (one person per program area)
- Coordination and communication with agency contact and Lead Reviewer
- Finalize the schedule
- ShareFile created





# **Example Monitoring Schedule**

Date	Activity
Monday, August 31, 2020	
9:00 a.m. – 10:00 a.m.	Virtual Entrance Meeting
10:00 a.m. – 5:00 p.m.	Core Activity 1: Career and Technical Education Objective 1.a: Accountability Objective 1.b: Local Application Objective 1.c: Local Use of Funds
Tuesday, September 1, 2020	
8:00 a.m. – 5:00 p.m.	Core Activity 2: Adult Education Objective 2.a: Performance Accountability System Objective 2.b: Local Application Objective 2.c: Leadership Activities
Wednesday, September 2, 202	0
8:00 a.m. – 5:00 p.m.	Core Activity 3: Financial Management Objective 3.a: Statutory and National Policy Requirements Objective 3.b: Contracts and Procurement
Thursday, September 3, 2020	Core Activity 3: Financial Management
8:00 a.m. – 5:00 p.m.	Objective 3.c: Equipment: Objective 3.d: Allowable Cost: Objective 3.e: COVID-19 Response
Friday, September 4, 2020	
8:00 a.m. – 2:30 p.m.	Questions, Provide Possible Technical Assistance and Wrap Up
2:30 a.m. – 3:30 p.m.	Virtual Exit Meeting





### FDOE ShareFile

#### **Purpose**

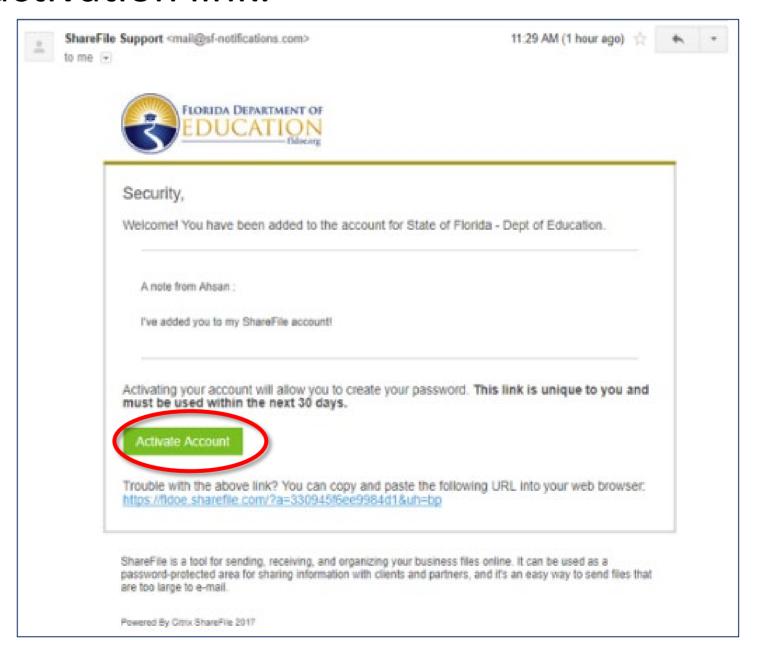
- Citrix ShareFile® is the Florida Department of Education's (FDOE) cloud-based secure file transfer solution. This solution is used to transfer files that are confidential, as well as too large and/or too numerous to send in a single email.
- Maintain compliance with The Family Education Rights and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





### **New Accounts**

You will receive an email to create your Citrix ShareFile® account. Click on the activation link:

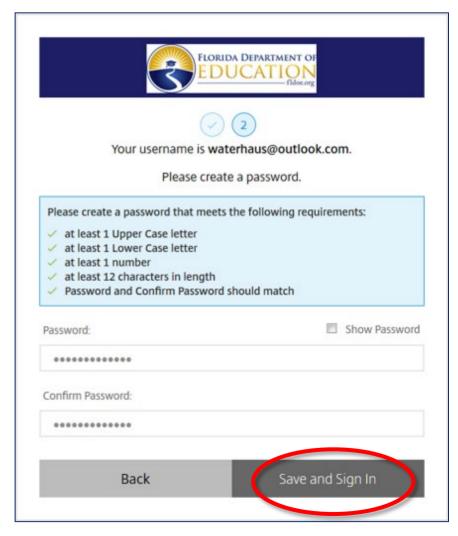






### **Password**

- For security reasons, your password:
- Is not stored
- Is not retrievable
- Expires after 180 days
- Cannot be the same as your last two passwords
- After five failed login attempts, you are locked out.
- Try again in five minutes
- Click Save and Sign In.





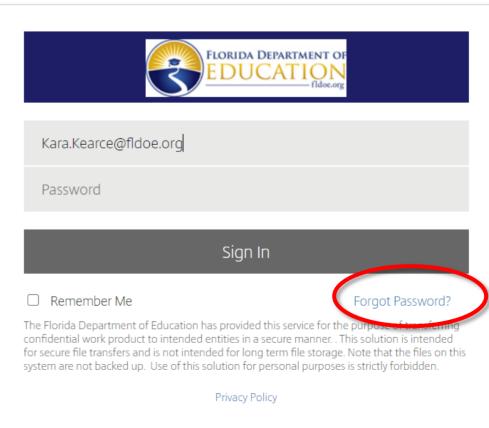


### **Password**

 Forgot your password? Or not receive the email from the IT Department?

Click on this link: <a href="https://fldoe.sharefile.com/Authentication/Login">https://fldoe.sharefile.com/Authentication/Login</a>

Type in your email address, click forgot password, walk through the steps to create a new one.





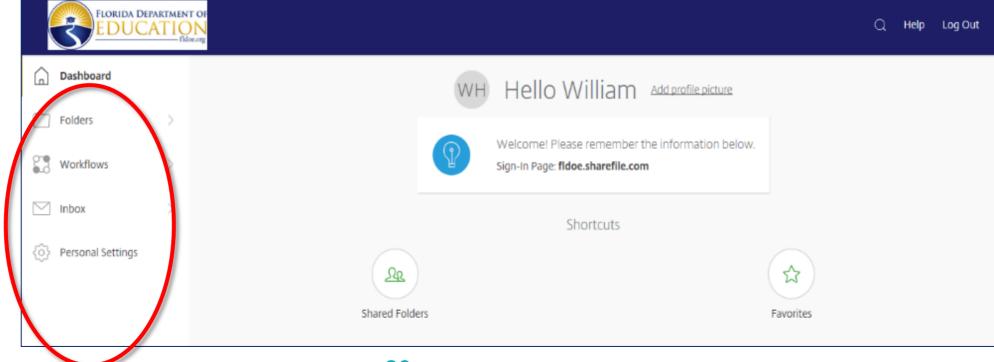


### Dashboard

- The dashboard is the first page you see when signing into your account. Menu items and buttons displayed depend on your account permissions and abilities as set by the Administrator.
- Access folders, people and settings are located on the left side of the dashboard.

Once you sign into the site, you should see the welcome

page.







## Upload

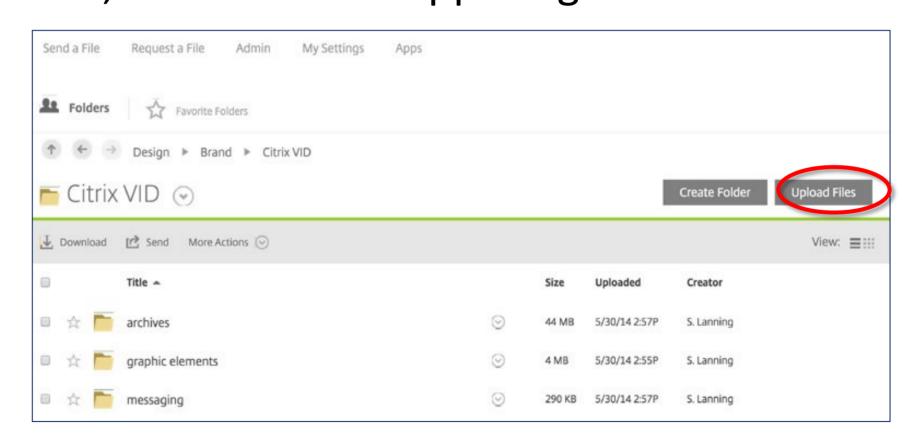
#### **Upload Files to Folders**

 Navigate to the folder to upload a file. You can only upload a file that you have permission to upload in the folder under Shared Folders.

Click Upload Files button, located in the upper right corner of the

page.

Easier way-drag and drop the files you wish to upload from your computer folder or desktop to the box on the screen.



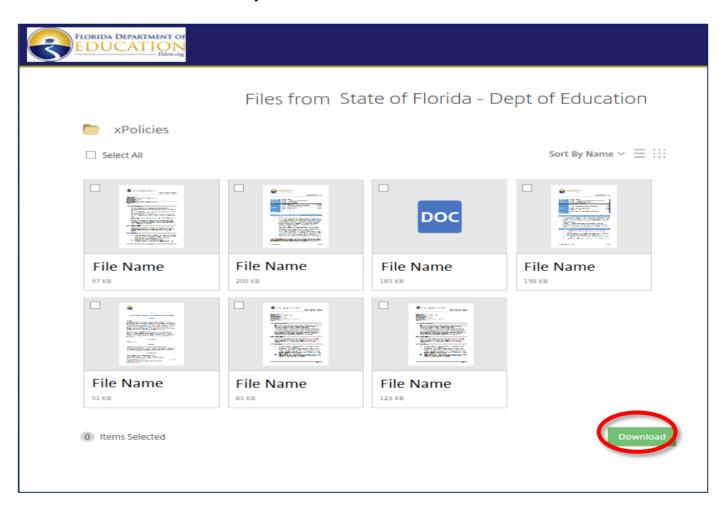




### Download

#### **Download Files from a Folder**

- Navigate to the folder in your Citrix ShareFile® account that contains the file to download.
- In the drop-down menu select the files, click Download.







# Virtual Desk Monitoring Activities

- Entrance Conference 1 hour maximum
  - Provider presentations (optional)
  - Overview of the monitoring process
- Virtual Interviews
  - Administrators
  - Staff/Faculty if needed
- Records Review (2018-19, 2019-20 and 2020-21)
  - Student level Literacy Completion Points, Occupational Completion Points, Industry Certifications, etc.
  - Finance Travel, Procurement/Purchasing, etc.
  - Personnel Employee time and effort verifications





# Virtual Desk Monitoring Activities

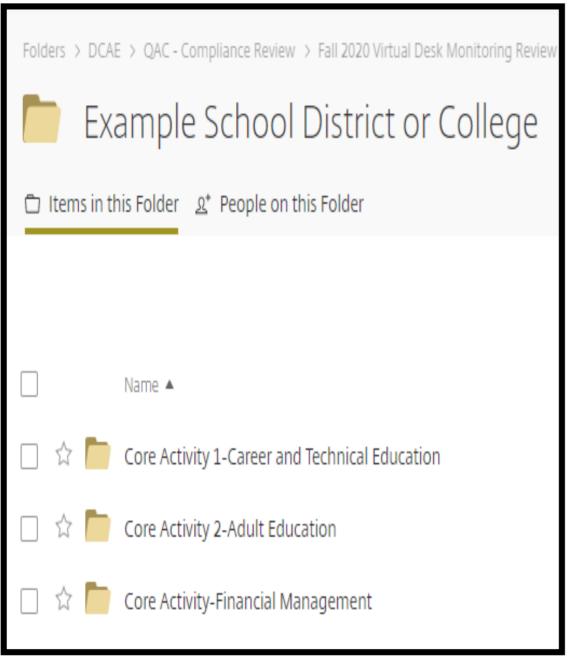
- Records Review (2018-19, 2019-20 and 2020-21)
  - Data Quality Standards
  - Size, Scope and Quality requirements for CTE
- Equipment Inventory
  - Complete Inventory of equipment purchased with grant funds, by site.
  - Reviewer will select a sample for further review
  - Pictures will be uploaded to the ShareFile
- Exit Interviews





### What to Expect in the ShareFile

Each folder will be set up by Core Activity (grants being monitored)



The Core Activity folder will have sub folder for the Objectives (protocols)

CAE > QAC - Compliance Review > Fall 2020 Virtual Desk Monitoring Review > Example School
Core Activity 1-Career and Technical Educa
ms in this Folder 🧸 People on this Folder
Name ▲
Objective 1.a Accountability
Objective 1.b Local Application
Objective 1.c Local Use of Funds





Law

Evidenc

Core Activity 3-Financial Management

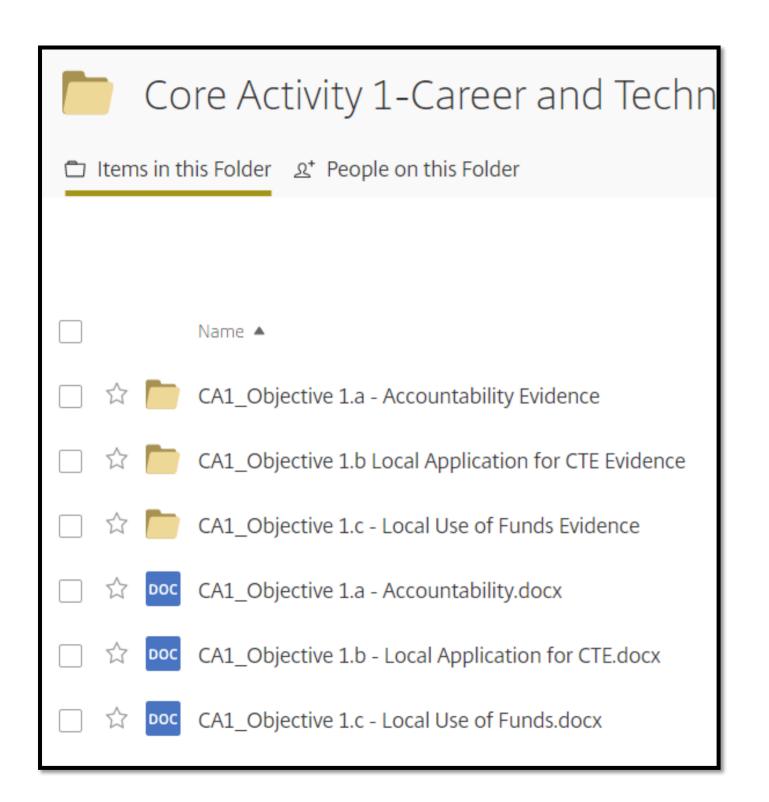
e 3.a – Standards for Financial and Program Manageme
--

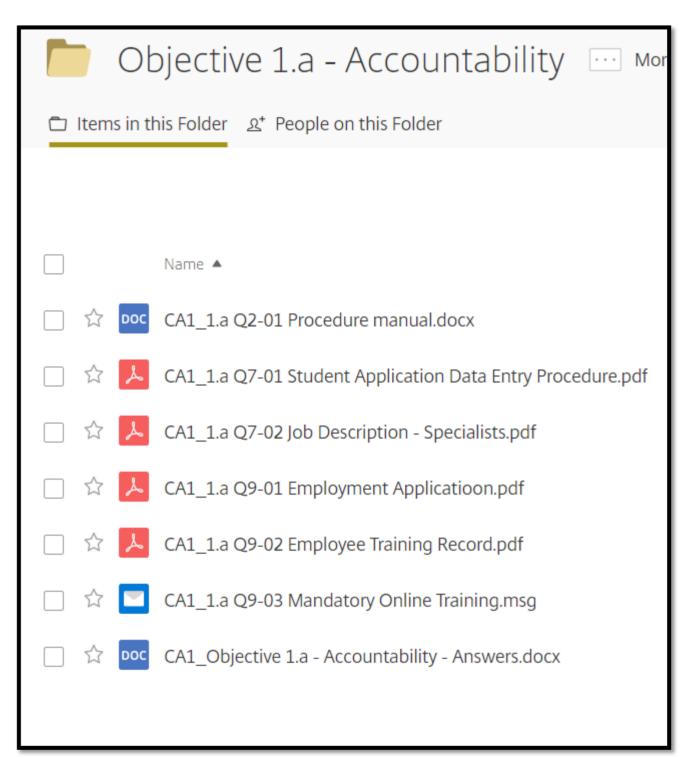
Pro	vider Review Protocol		Citation(s)	Methods of Collection / Notes  Examples of Documentary  Evidence
1.	Does the provider have a dedicated financial management system?	С	UGG 200.302(b)	Interview
2.	Does the provider have fiscal policies and procedures that include:  a. Standard accounting practices  b. Budgeting  c. Documentation and Reporting  d. Cash management	С	UGG 200.302 UGG 200.303	Financial management policies and procedures
3.	How does the provider monitor grant expenditures?	E		Interview
4.	Who is responsible for approving grant expenditures?	E		Interview  Documentation Review  Job description
5.	Does the provider maintain time and effort reports for staff paid by Perkins funds?	С	UGG 200.430 FDOE Green Book, C-19	Employee time and effort reports
6.	Does the provider have policies and procedures on grant-funded travel?	С	FL Statutes Sec. 112.061 UGG 200.474	Sample of grant-funded travel records
7.	Does the provider use Perkin's grant-funded purchasing cards?	Е		List of personnel with grant-funded purchasing cards     Sample of purchasing card transactions and reconciliations





## Organize Objective's Evidence









#### Internal Control Policies and Procedures

- Conflict of Interest
- Fraud
- Travel
- Inventory/equipment
- Procurement
- Allowability
- Gratuity
- Cash Management
- Retention of Records

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





## **Inventory Guidelines**

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

- Description of Property
- Serial Number/ID Number
- The source of the funding
- Title Holder
- Acquisition Date
- Cost of Property

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

- Percentage of Federal
   Participation
- Location of Property
- Use and Condition of Property
- Sale Price
- Date of Disposal





# **Example Property Inventory List**

#### Perkins-Funded Equipment Inventory 2 CFR 200.313

Acquisition Date	Description of Item	Serial Number	Model Number	Other Identificati on Number	Unit Cost	Funding Source(s) including the FAIN	Who holds the title?	% of Cost by Source	Location of Item	Use and Cond ition	Date of Inventory	Dispositi on Data	COVID 19 Donated or Loaned
9/28/18	Camcorder	1140512	HDC-CX250	TAG # 1	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
9/28/18	Camcorder	1140513	HDC-CX250	Tag #2	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
9/28/18	Camcorder	1140514	HDC-CX250	Tag # 3	\$1,098.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
4/15/19	3-D Printer	1142425	HDC-CX250	Tag #4	\$1,230.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135750	HDC-CX250	Tag #5	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135751	HDC-CX250	Tag #6	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
1/19/18	iss Mobile PreK Classpack	1135752	HDC-CX250	Tag# 7	\$1,040.00	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New	7/1/20		
3/21/19	Elec. Countertop Fryer	1142120	HDC-CX250	Tag# 8	\$1,593.59	Perkins Grant 103-	First Name. Last Name	100%	Sunshine School 123 Flag Street, Tall FL 32399 Room 223 B	New			





## **Post-Monitoring Activities**

- Post monitoring meeting with FDOE staff
- Thank you letters
- Evaluation Survey
- Monitoring Report
  - Preliminary Draft sent to Director for feedback
  - •Final Report- sent to Agency Head
- Resolution activities
  - Corrective Action / Action Plans
  - Follow-up communication
- Closure





## **Monitoring Report**

#### **Components:**

- Administration
- Data
- Curriculum and Instruction
- Financial
- Records Review
- Technology and Equipment
- Collaboration

Previous monitoring reports are available to review online:

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







## **Examples of Monitoring Findings**

- Failure to accurately report student data to FDOE: UGG 2 CFR 200.328 Monitoring and reporting program performance, F.S. 1008.43 Career program reporting requirements.
- Property control and inventory findings:
   Authority/Law: 2 C.F.R. 200, Uniform Grant Guidance, 200.313
   Equipment and EDGAR, Section 80.32 Equipment, (d)(1).





## **Examples of Monitoring Findings**

- Procurement findings: Authority/Law: 34 CFR 80.36(b) –
   Procurement Standards
  - Lack of policies and procedures for contracting and/or purchasing goods and services
  - Unauthorized purchases made against the federal grant
    - Spending federal grant dollars prior to approval of requested grant amendments.
    - Spending federal grant dollars WITHOUT approval of requested grant amendments.





#### **General Concerns**

- Last minute spending...students must benefit
- No staff development plans
- No leadership succession plans
- Lack of coordination among MIS/data, program and financial Professionals
- Outdated policies and procedures
- Lack of attention to off-site location resource needs
- Incomplete MOU and contract service agreements





### **Best Practice**

- Innovative uses of technology
- Continued collaboration with business and industry
- Integration of academics with career themed curriculum
- Effective use of advisory boards
- Effective communication between administrative, program and support staff





#### **Tools and Resources**

 Workforce Innovation and Opportunity Act of 2014 <a href="https://www.doleta.gov/WIOA/">https://www.doleta.gov/WIOA/</a>

 The Strengthening Career and Technical Education for the 21st Century Act (Perkins V) <a href="http://www.fldoe.org/academics/">http://www.fldoe.org/academics/</a> career-adult-edu/funding-opportunities/PerkinsV.stml

 Education Department General Administrative Requirements (EDGAR)

https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html





### **Tools and Resources**

 Federal Uniform Grant Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards)

https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards

 Florida Department of Education, Quality Assurance and Compliance <a href="http://fldoe.org/academics/career-adult-edu/compliance">http://fldoe.org/academics/career-adult-edu/compliance</a>











## Frequently Asked Questions

- Who should we include for the entrance/exit conferences and interview sessions?
- Will we still be required to upload documentation once our actual monitoring week has concluded?
- What if I have both secondary and post-secondary CTE programs? Will both program areas be monitored?
- If I have documentation/evidence that is applicable to multiple questions, do I need to upload it more than one time?





## Frequently Asked Questions

- Is it required that the provider have all documentation uploaded to the ShareFile prior to their monitoring week?
- Are the three interview sessions (CTE, AE, data and assessment) the only time you will need to speak directly to administrative and program staff?
- What happens if we are issued a finding over the course of the monitoring period?





# Quality Assurance and Compliance Team

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Henry Mack, Chancellor

Division of Career and Adult Education

Gloria Spradley-Brown, Chief Bureau of Grants Administration and Compliance





#### We welcome your comments, feedback, and suggestions Thank you!





