

Quality Assurance and Compliance

Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant

SpaceTEC

October 2024

Final Report

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Florida Department of Education Division of Career and Adult Education

SpaceTEC Pathways to Career Opportunities Grant (PCOG) Quality Assurance and Compliance Monitoring Report

I. INTRODUCTION

The Division of Career and Adult Education (Division) within the Florida Department of Education (Department) has several key responsibilities, including leadership, resource allocation, technical assistance, monitoring and evaluation. These duties require the Division to oversee the performance and regulatory compliance of federal and state funding recipients. The Quality Assurance and Compliance (QAC) office plays a critical role in this process by designing, developing, implementing and evaluating a comprehensive quality assurance system, which includes monitoring. This system aims to ensure financial accountability, program quality and regulatory compliance. As stewards of federal and state funds, it is the Division's duty to regularly monitor the use of workforce education funds and regulatory compliance of providers on a regular basis.

II. AUTHORITY

Pursuant to Section 1008.32, Florida Statutes, Rule 6A-20.046, Florida Administrative Code, the PCOG Request for Proposal and the Uniform Grant Guidance, also referred to as 2 Code of Federal Regulations Part 200, the Department is responsible for monitoring programs run by a sub-grantee or provider of supported activities to ensure adherence to relevant federal and state regulations.

III. QAC CORE MONITORING GUIDE

The Core Monitoring Guide is designed to be utilized by any reviewer who is conducting an onsite or desk monitoring of any program currently administered by the Division. The guide includes a brief overview of each aspect of the monitoring design and the process, as well as objectives that can be used when agencies are monitored or reviewed. The guide can be found on the Division's website at http://fldoe.org/academics/career-adult-edu/compliance.

IV. PROVIDER SELECTION

The QAC office may apply any specific monitoring strategy to any federal or state-funded provider at any time. There may be circumstances that may warrant onsite monitoring, desk monitoring review or other strategies regardless of a provider's risk matrix score.

The SpaceTEC monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Steve Kane, Executive Director, on August 16, 2024. The representative designated for the agency was also Mr. Kane.

V. SpaceTEC

Finance

The provider was awarded the following grant(s) for the fiscal years (FY) 2020-22 and 2021-23:

FY 2020-22

<u>Grants</u>	Grant Number	Grant Amount	<u>Unexpended</u>
Pathways to Career	90M-90310-1D301	\$ 161,544.00	\$ 2,803.80
Opportunities			

FY 2021-23

<u>Grants</u>	Grant Number	Grant Amount	Unex	pended
Pathways to Career	90M-90310-2D401	\$ 180,540.00	\$	0.00
Opportunities				

Additional information about the provider may be found at the following web address: https://spacetec.us/

VI. MONITORING ACTIVITIES

The monitoring activities include pre- and post-review planning, an entrance and exit conference, records review and interviews with administrators, if necessary.

Onsite Visits

• Eastern Florida State College (EFSC) – Cocoa Campus

Entrance and Exit Conferences

An introductory pre-visit meeting was conducted on October 18, 2024. SpaceTEC was notified about the standing of their monitoring review via email correspondence.

Name	Title	Entrance	Exit
		Conference	Conference
Maria Peterson	Apprenticeship Program Manager	X	
Steve Kane	Executive Director	X	
Division Monitoring			
Team			
Michael Swift	Program Specialist, QAC	X	
Chuck Davis	Program Specialist, QAC	X	

Interviews

Aside from the introductory pre-visit meeting, no interviews were necessary as part of the monitoring review.

Records Review

Program, financial, administrative and student records were reviewed. A complete list is provided in section VII, part F. In addition, policies and procedures were examined and discussed at various times during the monitoring review. Additionally, the Division's Research and Evaluation team requested that the monitoring team lead verify PCOG enrollees. All enrollment numbers were provided by SpaceTEC.

VII. OBSERVATION

- **A.** <u>ADMINISTRATION</u> refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.
 - The Executive Director is responsible for the management and technical direction of the SpaceTEC PCOG grant(s). Additionally, the Executive Director is responsible for the grant budget, expenditures, contracts for service, staff support, outreach, annual reporting and any other matters pertaining to their state award.
 - Formed in 2018, the Space Coast Consortium Apprentice Program (SCCAP), which includes SpaceTEC, partnered with EFSC to establish the Advanced Manufacturing Training Center onsite at the Cocoa campus. Apprenticeship training began shortly after, in 2019.
 - As an institution, SpaceTEC has demonstrated its effectiveness to design, implement and sustain a Registered Apprentice (RA) program by offering on-the-job training (OJT) to interns partaking in EFSC's Aerospace Technology program, in which they developed.
 - Deliverables are submitted to the Division on time and grant amendments are submitted, requiring minimal technical assistance. Deliverables are typically paid at full value.
 - SpaceTEC also partners with CareerSource Brevard to provide training resources, curriculum and instructors to train displaced workers and to help fill the gap anticipated to be left behind by a large population of current workers nearing retirement age.
- **B.** <u>DATA AND ASSESSMENT</u> refers to all the data and assessment system components, including test administration, test security, data collection, entry, reporting and procedures. The use of data in program decision-making is also explored and commented on.
 - The Division's Data, Research and Evaluation team requested that the monitoring staff confirm SpaceTEC's PCOG enrollment numbers submitted to the PCOG office and the state reporting database. Enrollment data was requested for the following occupations:
 - Advanced Machining
 - Mechatronics
 - Composites
 - Advanced Manufacturing
 - Upon review of the enrollment data received from SpaceTEC, the Data Research and Evaluation team noted discrepancies in what was reported to state. This will result in a finding. See the "Results" section for further detail.
 - All documentation was provided by SpaceTEC as part of the monitoring review.
- C. <u>CURRICULUM AND INSTRUCTION</u> refers to elements contributing to student learning and skill acquisition.
 - SpaceTEC's utilization of its state PCOG award(s) were used to expand their pre-existing Manufacturing RA program. Occupations supported via the RA include Mechatronics Technician, Advanced Computer Numerical Control Machinist and Advanced Manufacturing Fiber Composite Technician.
 - The PCOG-funded RA programs extend throughout Osceola, Seminole and Brevard counties.
 - Related Technical Instruction (RTI) partnerships exist with EFSC and Valencia College, and the primary employer partners for on-the-job training (OJT) include the following:
 - Airbus One Web Satellites
 - o Blue Origin
 - o Knights Armaments, Inc.
 - o Diamondback America

- o Vaya Space
- In addition to the RTI received at EFSC, each occupation served under the PCOG grant requires a certain number of hands-on OJT:
 - Mechatronics Technician 2,080 hours
 - Advanced Computer Numerical Control Machinist 4,400 hours
 - o Advanced Manufacturing Fiber Composite Technician 4,000 hours
 - Students earn OJT hours while working onsite with SpaceTEC industry partners.
- All RTI instructors are required to have a master's degree in their area of instruction, in addition to related industry experience. Instructors also receive technical instruction and professional learning through EFSC.
- **D.** <u>TECHNOLOGY AND EQUIPMENT</u> refer to a review of the technology and equipment used by students and instructors in the classroom; addresses access, availability, innovation, use and condition.
 - For the years monitored SpaceTEC did utilize state grant funds to purchase equipment that met the capitalized threshold of \$5,000. Additionally, equipment was purchased that also met the inventory control threshold of \$1,000. All inventory records were provided by SpaceTEC.
 - Monitoring staff conducted an inventory review at the EFSC Cocoa Beach Campus, and all
 inventory was accounted for and in its correct location. QAC staff verified all inventory at the
 \$5,000 threshold, as well as spot checked \$1,000 items for internal controls compliance. No
 issues were uncovered.
 - The Chief Instructor at the program location(s) is responsible for the inventory management of grant-funded equipment.
 - SpaceTEC conducts a physical inventory of equipment annually and the results are reconciled to existing equipment records. As part of the inventory, the condition, current utilization and continued need for the equipment is verified.
 - SpaceTEC reported no instances of lost, damaged or stolen granted-funded capital assets over the past 36 months.
- **E. RECORDS REVIEW** refers to reviewing the records and documents supporting compliance with federal and state rules and regulations. In addition, a sampling of financial and programmatic records is reviewed.

Documents reviewed were:

- Policies and procedures for financial reporting
- Policies and procedures for property accounting and management
- Final Project Disbursement Report
- Grant Budget Analysis
- PCOG performance outcome forms
- Apprenticeship activity reports
- Procurement records capitalized and non-capitalized
- Quarterly deliverables
- **FINANCIAL** refers to aspects of the federal fiscal requirements that providers must meet when expending federal funds, including financial management, procurement, inventory management and allowable costs.
 - QuickBooks is used as SpaceTEC's financial management system. The Executive Director is responsible for the management of all financial operations for their state award, with

- oversight from the Board of Directors. The financial management system is based on the analysis of financial information and knowledge of the current grant's objectives and goals.
- SpaceTEC does not pay salaried positions with grant funds but does support numerous contractual agreements for instructional personnel. Despite not having any salaried positions, time and effort reports were provided for individuals under contract.
- The Executive Director serves as the dedicated contract manager for PCOG grants and approves and signs off on all related documentation. It is his responsibility to ensure all phases and deliverables of any contract are adhered to. Policies and procedures were provided.
- Additionally, the Executive Director oversees and directs the accounting process through
 developing and revising operating budgets. Amendments are submitted to the division in the
 event that the scope of the original award notification changes.
- SpaceTEC has policies and procedures for financial and fiscal reporting in compliance with the Office of Management and Budget Uniform Administrative requirements. The following components of their financial policies and procedures manual were reviewed as part of the monitoring process:
 - o Purchasing guidelines and procedures
 - o Internal controls
 - Conflict of interest
 - o Contract management
 - Management of fixed assets
 - Procurement
 - o Time and effort
 - o Travel
- No purchases shall be authorized without prior approval from the Division via a grant award letter and/or subsequent amendment(s). Upon approval from the Division, the Executive Director is responsible for all purchases charged to the state award.
- It is the responsibility of the Executive Director to approve all purchases and negotiate any high dollar items that require bids and/or quotes prior to acquisition. Procedures were provided for purchases that do not exceed the current federal "Simplified Acquisition Threshold" of \$100,000. Additional procedures were provided that mandate the requirements for sealed bids and competitive/non-competitive proposals.
- SpaceTEC provided additional fiscal records such as:
 - o Contractual agreements and deliverables
 - o Procurement
 - Time and effort reports
 - o Travel
 - All records were in accordance with applicable local, state and federal law.
- QAC monitoring staff conducted a fiscal review of the providers' grant budget analysis (GBA). All object codes and dollar amounts pre-approved on their grant award were adhered to.
- **G.** <u>COLLABORATION</u> refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.
 - SpaceTEC has numerous collaborations, partnerships and MOUs within the local community. They offer additional educational and job experiences to students within their service area. The list of partners includes, but is not limited to:
 - o CareerSource Brevard
 - o Airbus One Web Satellites

- Blue Origin
- Knights Armaments, Inc. Diamondback America
- o Vaya Space
- Valencia CollegeEastern Florida State College

VIII. RESULTS

SpaceTEC was found to be out of compliance in the following area.

Finding Number	1
Area	Student Data Reporting
Finding Summary	Student enrollment data was reported incorrectly.
Finding Detail	SpaceTEC incorrectly reported their data to the State via CCTCMIS and PCOG for Advanced Machining, Composites, Additive Manufacturing, and Mechatronics in 2020-21, 2021-22, 2022-2023 and 2023-2024 under 2019-FL-72905—Space Coast Consortium Apprenticeship Program, GNJ. Discrepancies between data reported to the state via CCTCMIS and data reported to the Compliance Monitoring Team via Agency survey.
	Reported to the secondary CCTCMIS State Reporting System: • Advanced Machining (2020-2023): 0 • Advanced Machining (2023-2024): 1 • Additive Manufacturing (2020-2024): 0 • Composites (2020-2024): 0 • Mechatronics (2020-2023): 0 • Mechatronics (2023-2024): 4
	Reported by the Agency via Survey Response: Advanced Machining (2020-2021): 11 Advanced Machining (2021-2022): 1 Advanced Machining (2022-2023): 11 Advanced Machining (2023-2024): 4 Additive Manufacturing (2020-2024): 0 Composites (2020-2022): 0 Composites (2022-2023): 1 Composites (2023-2024): 0 Mechatronics (2020-2021): 0 Mechatronics (2021-2022): 1 Mechatronics (2022-2023): 0 Mechatronics (2022-2023): 0
	Conclusion: There was a discrepancy between data reported to the state via CCTCMIS and SpaceTEC's survey responses for above

	occupations for three consecutive years (2021-2024). The reported figures do not align, indicating a potential reporting error that may require further action.
Citation	Florida Statutas 1011 90
Citation	Florida Statutes 1011.80
Recommended/Anticipated Corrective Action	The Director of Research and Evaluation, Dr.
•	Brittany C. Ross, will implement and monitor the
	Corrective Action Plan (CAP). Once the finding is
	turned over to her staff, the SpaceTEC monitoring
	review will be considered closed. All further
	communication regarding the CAP will be with
	Dr. Ross and her office.
Anticipated completion date:	The CAP will be complete when the provider
	demonstrates a full understanding and compliance
	with state reporting requirements and mandatory
	training.
Name and Title responsible for CAP	Stave Kane, Executive Director, SpaceTEC

IX. SUMMARY

After completing the monitoring review and receiving any additional information requested, a preliminary report is sent to the provider for their review. The Division monitoring team lead may consider comments at their discretion. Once the final report is approved, it will be sent to the agency head and a copy will be sent to the provider's designated contact person. The final report will also be posted on the Department's website, which can be found at:

https://www.fldoe.org/academics/career-adult-edu/.

Once all outstanding corrective action plan items have been completed (when applicable), the Division will issue a closure letter to the agency head and designated contact person. This letter will signify the end of the monitoring process and that no further action is required.

The monitoring team would like to extend their appreciation to all participants in the SpaceTEC monitoring review. A special thanks is offered to Mr. Steve Kane and Ms. Maria Peterson for their participation during this process.

Please address inquiries regarding this report to:

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