

Department of Education
Office of Inspector General – Internal Audit
Six-Month Status Report on: Jackson County School Board Adults with Disabilities Program
Report # A-2021DOE-004 Issued: January 29, 2021
Status as of July 29, 2021

Finding	Recommendation(s)	Management Response as of January 29, 2021	Management Response as of July 29, 2021	Anticipated Completion Date & Contact
<p>DVR did not conduct effective monitoring of the grant.</p>	<p>We recommend DVR complete monitoring plans in accordance with the risk assessment and reflect sufficient activities to monitor high risk providers. We additionally recommend DVR conduct monitoring in accordance with the risk assessment and monitoring plan. We recommend that DVR promptly provide any monitoring results and recommendations for improvement to JCSD and ensure corrective action plans have been created and initiated on noted program deficiencies. We recommend that DVR include a review of expenditures incurred and the supporting documentation as part of the monitoring efforts to ensure expenditures are supported,</p>	<p>The Jackson County School District has been assigned a quarterly monitoring by desk review. The monitoring sequence coincides with the grantees invoice and billing schedule.</p>	<p>Quarterly monitorings were completed as indicated below:</p> <p>Quarter 1 – February 16, 2021</p> <p>Quarter 2 – February 16, 2021</p> <p>Quarter 3 – May 27, 2021</p> <p>There were no concerns or findings noted during these scheduled monitorings.</p>	<p>Complete Monica Moyer 850-245-7004</p>

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	allowable, allocable, and necessary to the performance of the grant.			
Grant language was unclear and inconsistent, and JCSD did not meet all quarterly grant deliverables.	We recommend DVR review the grant language and ensure the deliverable requirements are consistent throughout the grant. We recommend DVR determine the intent of the grant and the desired deliverables and modify the grant language accordingly to clarify the requirements for quarterly and cumulative benchmark attainment. If the grant language remains unchanged, we recommend DVR ensure deliverables are met on a quarterly basis through review of AIEPS, STOs, and other documentation that support benchmark progress and achievement. If quarterly	DVR is in the process of language modification to the Adults with Disabilities Grants. DVR in collaboration with Office of Grants Management are working to complete the changes by the end of February. This will allow communications with the grantees and shoring up departmental steps to complete the modification process.	The original executed grant for the current grant period reflects that the grantee is contracted to serve 100 adults with disabilities by the end of fiscal year 2020-21. Each of the 100 participants are required to meet 75% performance outcomes for Benchmark 1 and 50% performance outcomes for Benchmark 2.	Complete Monica Moyer 850-245-7004

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	<p>deliverables are not met, we recommend DVR require JCSD to complete a corrective action plan.</p>			
<p>A lack of communication and sense of urgency related to this grant led to delayed execution of the grant, inconsistent submission and review of quarterly reports, and insufficient opportunities for program improvement throughout the grant period.</p>	<p>We recommend DVR execute the AWD grants in a timely manner. We additionally recommend that DVR establish a consistent method of submittal and document receipt of the required quarterly documents, either by requiring JCSD to upload documents to a secure online portal or mail the documents as a hard copy. Should hardcopy be the preferred method of delivery, we recommend that a tracking system be used to verify when DVR receives the documents. Furthermore, we recommend that DVR establish a plan to address</p>	<p>A new electronic grant routing system has been implemented by Office of Grants Management. This electronic system will be a more efficient way to route grants through the assigned channels for review and approval. In addition, DVR is working with Information Technology to establish an electronic process that will allow the grantees to securely upload quarterly invoices and supporting documentation. DVR will work on improving the successor planning for staff turnover, to ensure continuity in the oversight and management of the grants.</p>	<p>The Electronic Grant Routing System is owned by the Office of Grants Management (OGM). Soft date for release was 4/1/2020. The electronic system is now fully active and has been a more efficient and successful mechanism for the grant routing process.</p> <p>DVR worked internally with IT to develop a secure link to send to grantees for quarterly submittal of invoices and supporting documentation. DVR IT will issue a new link annually to coincide with</p>	<p>Complete Monica Moyer 850-245-7004</p>

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	staff turnover during a grant term to ensure they continue to receive documents timely, review submittals in a timely manner, and verify achievement of deliverables.		the new fiscal year/grant period.	

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DVR did not conduct effective monitoring of the grant.	We recommend that the JCSD ensures that all expenditures align with the approved original budget narrative form. We additionally recommend JCSD ensure the DOE 300 forms and 301 forms submitted to DVR are accurate, supported, and align with the final 399 form.	Using the approved budget narrative, including approved budget amendments, the JCSD will monitor all expenditures related to the AWD allocation at the site and district level to ensure compliance. Personnel from the district finance office will complete the DOE 300 and 301 each quarter and submit to AWD coordinator for submission.	The Assistant Finance Director (AFD) at the District office, in coordination with the AWD program manager reviews expenditures related to AWD project funds. The AFD prepares the quarterly expense report and provides to AWD coordinator for submission.	ongoing
Grant language was unclear and inconsistent, and JCSD did not meet all quarterly grant deliverables.	We recommend JCSD submit corrective action plans in the event quarterly deliverables are not met. We additionally recommend that JCSD include a summary of the number of participants who have achieved benchmarks 1 and 2 in the quarterly document submittal. These numbers should be supported by the accompanying STOs.	Per notification from DVR regarding failure to meet quarterly deliverables, the JCSD will complete corrective action plan as directed. The JCSD has developed a spreadsheet to be submitted with quarterly report identifying the number of participants enrolled by the quarter and the number of participants who meet benchmark 1 and 2 deliverables, by quarter.	Spreadsheet has been developed and is submitted with quarterly report.	Jan 7, 2021

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	<p>Furthermore, we recommend JCSD ensure that documentation submitted to DVR is complete, accurate, and supports the achievement of quarterly deliverables.</p>			
<p>A lack of communication and sense of urgency related to this grant led to delayed execution of the grant, inconsistent submission and review of quarterly reports, and insufficient opportunities for program improvement throughout the grant period.</p>	<p>We recommend that JCSD ensure quarterly documents are submitted in the timeframe required by the grant terms. In the event documents are mailed, we recommend JCSD retain documentation to demonstrate the date the items were mailed and ensure deliver of the documents to DVR.</p>	<p>Using the quarterly report table, the JCSD will submit quarterly reports in the means as directed by DVR. Should the quarterly reports be sent via USPS, documentation from USPS will be filed for verification of timely submission.</p>	<p>Upon mailing, documentation provided by the USPS is filed with quarterly report documentation.</p>	<p>ongoing</p>