Quality Assurance and Compliance

Virtual Desk Monitoring Review
for
Pathways to Career Opportunities Grant

Argos – Applied Intelligence

February 3-7, 2025

Final Report

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Florida Department of Education
Division of Career and Adult Education

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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.

II.   AUTHORITY

Pursuant to Section 1008.32, Florida Statutes, Rule 6A-20.046, Florida Administrative Code, the Pathways to Career Opportunities Grant 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.

Argos - Applied Intelligence (Argos, AI) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Eduardo Cabrera, President and Chief Executive Officer, on December 12, 2024. The designated representative for the agency was Mr.Cabrera. The Division's representative conducting the VDMR was Program Specialist Charles Davis of the QAC.

V.   ARGOS-APPLIED INTELLIGENCE

Finance
The provider was awarded the following grant for fiscal year 2023-2024:

FY 2023-24

Grant	Grant Number	Grant Amount	Unexpended
Pathways to Career Opportunities	85O-90310-4Q001	$ 90,620.00	$ 22,364.50

Additional information about the provider may be found at the following web address:
https://www.argos-ai.com/

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
Since the provider did not have capitalized equipment above the $5,000 threshold, an onsite visit was not required.

Entrance and Exit Conferences
An introductory Teams meeting with Mr. Eduardo Cabrera took place on January 27, 2025. An exit telephone meeting took place on February 5, 2025 to inform him of the final standing of the monitoring review.

Name	Title	Entrance Conference	Exit Conference
Eduardo Cabrera	President & Chief Executive Officer, Argos, AI	X	X
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	X	X
Chuck Davis	Program Specialist, QAC	X	X

Narrative

Argos, AI is a South Florida firm specializing in cybersecurity workforce development, research and services. Argos, AI leverages a network of current and former private industry, threat intelligence, federal law enforcement, military intelligence analysts, agents and officers. With over 40 years of operational experience, Argos, AI focuses on developing and delivering data and intelligence-driven instructional design, cyber cybersecurity research and cybersecurity services in areas that include Cyber Threat Intelligence, Cybercrime Investigations, Threat Hunting, Incident Response, Digital Forensics and Data Engineering. The Cyber Warrior Apprenticeship Program was available for Information Security Analyst/Cybersecurity Analyst Roles. The program is 52 weeks in duration that includes 200 clock hours of lecture/labs, and 2,000 clock hours of on-the-job training. The certification training delivered is centered on intermediate to advanced level certifications using curriculum from Comp Technology Industry Association and EC Council partners. The Argos, AI Cyber Warrior Apprenticeship Program was the sponsor and the Related Technical Instruction (RTI) provider of the Argos, AI Cyber Warrior Preapprenticeship program.

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.

- Argos, AI designs and delivers Cybersecurity Workforce Development (CWD) programs that include bootcamps and customized programs that focus on specialized areas that include Cyber Threat Intelligence, Cybercrime Investigations, Threat Hunting, Incident Response, Digital Forensics and Data Engineering. These programs teach five interdisciplinary competencies and combine micro-skill instruction modules, labs, certification training and mentorship. Programs are designed to be taken synchronously and or asynchronously through a series of in-person and or online courses and workshops using their Applied Training & Assessment Center (ATAC) platform.

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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.

- The PCOG team requested that the monitoring staff confirm Argos, AI's PCOG enrollment numbers submitted to the PCOG office. Enrollment data was requested for the following occupations:
  - Cyber Security Analyst

C.   <u>**CURRICULUM AND INSTRUCTION**</u> refer to those elements that contribute to student learning and skill acquisition.

- No curriculum and instruction were observed during the monitoring review.

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.

- All inventory with the value of $1,000 or more met the criteria set forth by federal, state and local guidelines and is included within their fixed asset system.

E.   <u>**RECORDS REVIEW**</u> 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 are:
- Procedures for finance and procurement
- Policies and procedures for property management
- Inventory records
- Procurement records
- Standards of Apprenticeship manual
- Employee/employer Prepprenticeship contract

- Instructional and on-the-job training manual

F. **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.

- The President & Chief Executive Officer ensures the efficient management of PCOG grant funds. The following components of their financial policies and procedures manual were reviewed:
  - o Budget Implementation
  - o Cash Management
  - o Methods of accounting
  - o Fiscal internal controls
  - o Records and reporting
  - o Inventory Management
  - o Procurement
  - o Conflict of interests
- Monitoring staff conducted a grant budget analysis of Argos,AI's grant. All object codes and dollar amounts pre-approved on their grant award were adhered to.

G. **COLLABORATION** refers to the collaborative agreements, partnerships or memoranda of understanding that are in place to benefit an agency's programs and students.

- o Argos, AI has numerous collaborations and MOUs within the local community. They often offer additional educational and job experiences to students. The list of partners includes, but is not limited to the following:
  - o CompTIA
  - o CareerSource South Florida

VIII. RESULTS

Argos, AI was found to be compliant with the grant. However, there are concerns that the Registered Apprenticeship and Pre-Apprenticeship programs do not comply with the Code of Federal Regulations and State Board Rules. See details below.

Program Concerns	1
Area	Enrollment
Details	While the Argos, AI Cyber Warrior Pre-Apprenticeship Program (P-122) had 40 participants during the 2023-2024 program year, the Argos, AI Cyber Warrior Apprenticeship Program, GNJ (2020-FL-78246) had no enrollment. Our records currently indicate a 2:1 ratio of apprentices to journeyworkers with four journeyworkers employed by Argos, AI (at the time of registration in 2020). This provides a maximum training capacity for 8 apprentices at a time. This raises questions about the viability of the preapprenticeship program and the training capacity of the registered apprenticeship program.
Effectiveness	Per Rule 6A-23.010(1), "The primary objective of the preapprenticeship program is to provide Florida residents with educational and training opportunities to enable them, upon completion of preapprenticeship training, to

	obtain entrance into a registered apprenticeship program, based upon the selection criteria established by a registered apprenticeship program sponsor." The Office of Apprenticeship will continue to monitor the activity of the registered apprenticeship program and effectiveness of the preapprenticeship program in producing apprentices for the Argos, AI Cyber Warrior Apprenticeship Program, GNJ (2020-FL-78246).

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

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.

On behalf of the Division, the monitoring team would like to extend their appreciation to all participants in the Argos, AI VDMR. A special thanks is offered to Mr. Eduardo Cabrera for his participation and leadership during this process.