



FLORIDA DEPARTMENT OF
EDUCATION
CAREER AND ADULT EDUCATION

Quality Assurance and Compliance

Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant

Community Health IT, Inc.

October 2024

Final Report

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Florida Department of Education
Division of Career and Adult Education

**Community Health IT, Inc.
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 Community Health IT, Inc. (CommHIT) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Kevin Salzer, Chief Technology Officer, on August 16, 2024. The designated representative for the agency was also Mr. Salzer.

V. CommHIT

Finance

The provider was awarded the following grant for the fiscal year 2021-23:

FY 2021-23

<u>Grants</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	89J-90310-2D401	\$ 199,708.00	\$ 0.00

Additional information about the provider may be found at the following web address:

<https://commhit.org/>

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

No onsite visits were necessary as part of the monitoring review.

Entrance and Exit Conferences

An introductory pre-visit meeting was conducted on October 29, 2024. The participants are listed below:

Name	Title	Entrance Conference	Exit Conference
Kevin Salzer	Chief Technology Officer, CommHIT	X	X
Division Monitoring Team			
Michael Swift	Program Specialist, QAC	X	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 CommHIT.

VII. OBSERVATION

A. **ADMINISTRATION** refers to the management and supervision of programs, the structure of programs and services, grant oversight and other administrative areas.

- As an institution, CommHIT has been in business since 2011 as a health and human services organization. Their primary work is to help rural health systems adopt health technology services and address technology gaps among underserved and underrepresented communities, including cybersecurity and telehealth. Prior to receiving their PCOG grant, CommHIT did not sponsor apprenticeship programs.

- The ability to manage their grant and apprenticeship program stems from CommHIT's leadership serving as official Health Information Technology (IT) advisors for the National Professional Association of Healthcare Management (PAHCOM). CommHIT developed one of PAHCOM's top-tier certification programs: the Health Information Technology Certified Manager for Physician Practice. CommHIT has continued to update this certification to accommodate the ever-evolving nature of health IT policies and trends.
- CommHIT and CareerSource Brevard worked in conjunction to ensure local workforce needs are being met. CareerSource will provide employer and participant referrals and additional training dollars for CommHIT, when available.
- Deliverables are submitted to the Division on time, requiring minimal technical assistance. All deliverables were paid at full value.

B. DATA AND ASSESSMENT 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 CommHIT's PCOG enrollment numbers submitted to the PCOG office and the state reporting database. Enrollment data was requested for the following occupations:
 - Information Security Analyst
 - Network and Computer Systems Administrators
- CommHIT provided sufficient enrollment data and documentation as required by the Division.
- All documentation was provided by CommHIT as part of the monitoring review.

C. CURRICULUM AND INSTRUCTION refers to elements contributing to student learning and skill acquisition.

- CommHIT used their PCOG funding to support a new Registered Apprenticeship (RA) program for Information Security Analysis and Network and Computer Systems Administrators.
- All sponsors participating in the RA program are generally safety net medical facilities that serve vulnerable and rural populations. They are all either Critical Access Hospitals in rural Florida counties or behavioral health and mental health centers.
- Both occupation paths have their own set number of required technical instruction (RTI) hours and on-the-job (OJT) training hours.
 - TeleHealth Navigator – 2,000 OJT, 174 RTI
 - Cybersecurity First Responder – 2,000 OJT, 178 RTI
- RTI delivery will be web-based learning, while the OJT component of the program will be at local health facilities. Each sponsor employers' IT Department Supervisors and TeleHealth Program Managers will serve as the apprenticeship Journey Workers at a 1:1 ratio with the apprentices. Each enrollee will also be appointed a mentor for the duration of the RA program.
- Program Sponsors include:
 - George E. Weems Memorial Hospital
 - Doctors Memorial Hospital
 - Lee Health
 - Lake Butler Hospital
 - Meridian Behavioral Health Center, Inc.
 - Peace River Center for Personal Development
- Apprentices in both occupations will be paid a progressively increasing schedule of wages based on a percentage and a dollar amount of the hourly Journey Worker wage rate.

- CommHIT prides itself on the recruitment and retention of underserved and underrepresented populations. CommHIT works with CareerSource Brevard to review data provided by employers and labor market information to promote diversity, identify gaps in representation and develop messaging to best recruit identified under-represented populations.

D. TECHNOLOGY AND EQUIPMENT 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, CommHIT did not utilize state grant funds to purchase any equipment that met the capitalized threshold of \$5,000. Additionally, no items were purchased that cost more than \$1,000. No inventory review was required.

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
- Final Project Disbursement Report
- Grant Budget Analysis
- PCOG performance outcome forms
- Apprenticeship activity reports
- Procurement records – provided with quarterly deliverables
- Quarterly deliverables
- Time and effort reports
- Apprenticeship agreements
- Apprenticeship Employee Letter of Commitment

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.

- Thompson Reuter’s Creative Solutions is used as CommHIT’s financial management system. Grants, contracts, deliverables and all aspects of fiscal management are housed within the system.
- Each grant and/or contract is tracked utilizing a “class” code that is specific to a particular grant. When preparing financial reports, each individual class code is able to prepare statements pertaining only to that grant. Additionally, the class codes also direct financial transactions to ensure that the appropriate funding source is matched with the correct transaction.
- CommHIT does pay for one salaried position and supports contractual services for training and development, when necessary, with PCOG funding. Time and effort reports were provided by CommHIT.
- CommHIT has policies and procedures for financial management and fiscal reporting that adhere to the terms of their state grant. The following components of their financial policies and procedures manual were reviewed as part of the monitoring process:
 - Cash Management
 - Credit Card Management (Purchasing card)
 - Accounting
 - Compensation for Personnel Services

- Travel
- Equipment
- Procurement
- Conflict of Interest

All procedural documents were provided by CommHIT.

- It is the responsibility of the President to approve all purchase requests. If approved, the Purchasing Agent will secure the necessary quotes and/or negotiate any high dollar items that require bids prior to acquisition. All purchases above \$35,000 require a competitive bidding process and must be approved by the Board of Directors.
- CommHIT does not have a dedicated contract manager position, but all contractual agreements do have personnel that are responsible for ensuring that the agreement includes all necessary components, including contract provisions and deliverables, if any.
- CommHIT provided additional fiscal records such as:
 - Time and effort reports for the Apprentice Coordinator
 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. COLLABORATION refers to the collaborative agreements, partnerships or memoranda of understanding (MOU) that are in place to benefit an agency's programs and students.

- CommHIT 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:
 - CareerSource Brevard
 - Holmes County Hospital Corporation
 - Lake Butler Hospital
 - George E. Weems Memorial Hospital
 - Peace River Center for Personal Development
 - Meridian Behavioral Healthcare, Inc.
 - A&B Security, LLC

VIII. RESULTS

CommHIT was not found to be out of compliance.

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.

On behalf of the Division, the monitoring team would like to extend their appreciation to all participants in the CommHIT monitoring review. A special thanks is offered to Mr. Kevin Salzer for his participation and leadership during this process.



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