



FLORIDA DEPARTMENT OF  
**EDUCATION**  
CAREER AND ADULT EDUCATION

## **Quality Assurance and Compliance**

### **Virtual Desk Monitoring Review for Pathways to Career Opportunities Grant**

Learning Alliance Corporation

**October 2024**

Final Report

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Florida Department of Education  
Division of Career and Adult Education

**Learning Alliance Corporation  
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 is located 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 Learning Alliance Corporation (LAC) monitoring strategy was determined to be a virtual desk monitoring review (VDMR). Notification was sent to Mr. Fred Arnold, Executive Director, on August 16, 2024. The designated representative for the agency was Ms. Ruth Tirado. The Division's representative conducting the VDMR was Program Specialist Michael Swift of the QAC.

**V. LEARNING ALLIANCE CORPORATION**

**Finance**

The provider was awarded the following grant for the fiscal year 2022-23:

**FY 2022-23**

<u>Grant</u>	<u>Grant Number</u>	<u>Grant Amount</u>	<u>Unexpended</u>
Pathways to Career Opportunities	921-90310-3Q501	\$ 110,025.00	\$ 0.00

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

<https://www.mylearningalliance.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**

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

**Entrance and Exit Conferences**

An introductory pre-visit meeting was conducted on November 6, 2024. Email correspondence was shared with LAC to inform them of the outcome of their review. The participants are listed below:

<b>Name</b>	<b>Title</b>	<b>Entrance Conference</b>	<b>Exit Conference</b>
Ruth Tirado	Director, LAC	X	X
Fred Arnold	Executive Director, LAC	X	
Gabriel Rogasner	President and Chief Executive Officer, LAC	X	
<b>Division Monitoring Team</b>			
Michael Swift	Program Specialist, QAC	X	X
Charles 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.

## VII. **OBSERVATION**

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

- Over the course of 20 years, since its founding in 2004, LAC has written over 400 training related grants to help businesses in the Tampa Bay region build training initiatives that help support Information Technology and Manufacturing workforce development. Additionally, LAC is licensed by the Department as an educational institution.
- Through LAC and their many employer partnerships, they have a history of training apprentices and managing apprenticeship programs.
- LAC was only awarded PCOG funding for the 2022-23 program year. Its grant was managed by the Executive Director, who was responsible for all fiscal aspects of the grant and ensuring that all grant provisions were adhered to.
- Deliverables were submitted to the Division on time, needing limited technical assistance. All deliverables were paid at or near 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.

- LAC is not required to report student data through the state data reporting system. No data was verified during the review.

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

- LAC's PCOG funding went toward the expansion of its current Information Technology and Manufacturing registered apprentice programs. Occupations sponsored under PCOG included Information Security Analyst, Software Developer, Database Administrator, Market Research Analyst, Industrial Engineering Technician, Fiber Optic Technician and Telecommunications Technician.
- The determination to expand the occupations was made using a variety of labor market data, in addition to numerous letters of support from local industry for structured training within the targeted industries.
- LAC has over 400 employer partners for its pre-apprenticeship and apprenticeship programs. These partners sponsor, train, hire and upskill their apprentices.
- LAC, along with their employee partners, are driven by a mission to reach special needs student populations.
- LAC and CareerSource's Polk, Pinellas, Hillsborough, Central Florida and Pasco-Hernando work in conjunction to ensure local workforce needs are being met. CareerSource provides employer and participant referrals and additional training when available.
- As an approved training provider for the aforementioned CareerSource boards, LAC works closely with employers to customize and coordinate apprenticeship onboarding, on-the-job (OJT) training, related technical instruction (RTI), apprentice wage progression and credentialing.
- Hands-on training may vary, but all occupations under the PCOG expansion require a minimum of 2,000 hours of OJT and 12 months employment with a sponsor. RTI is provided, both in person and via web-based learning, and vary in length based on the selected occupation. LAC provides the RTI but also partners with Clark University and the National Association of Tower Erectors.

- All classroom-based RTI is provided at LAC’s campus or at agreed upon satellite locations to meet student needs directly in their community. Instructors and faculty have the required industry and state credentials (e.g., certifications, licenses, degrees) to teach their respective occupations.
- LAC employer partners are required to sign an apprenticeship sponsor agreement. These agreements dictate the educational aspects of the program, as well as ensuring that apprentices follow all OJT and RTI learning criteria.

**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 year monitored, LAC did not utilize state grant funds to purchase any equipment that met the capitalized threshold of \$5,000. No inventory review was required.
- Although no capitalized equipment was purchased during the years monitored, LAC utilizes Monday.com® to effectively monitor and track all grant-funded equipment, when applicable.
- The Director of Education and Program Manager are responsible for all equipment that is purchased with grant funds.

**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 accounting
- Apprenticeship employer agreement form
- Final Project Disbursement Report
- Grant Budget Analysis (GBA)
- Monthly transaction ledger
- PCOG performance outcome forms
- Purchase invoices
- Apprenticeship activity reports
- Quarterly deliverables

**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.

- QuickBooks® is used as LAC’s financial management system. Grants, contracts, deliverables and all aspects of fiscal management are housed within the system.
- LAC does not pay for salaried positions with PCOG funding but do have contracts with workforce administrators and liaisons for various tasks.
- LAC does not use grant-funded P-cards for expenditures.
- LAC 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 and Disbursement
  - Accounting
  - Payroll and Personnel Services
  - Procurement
  - Conflict of Interest

- All procedural documents were provided by LAC.
- LAC provided additional fiscal records such as:
  - Purchase invoices
 All records were in accordance with applicable local regulations, and state and federal law.
- QAC monitoring staff conducted a fiscal review of the providers' 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.

- LAC 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 Polk
  - CollabFirst
  - Clark University
  - Workforce Evolved
  - Public Consulting Group
  - National Association of Tower Erectors

## VIII. RESULTS

LAC was not found to be out of compliance. The following concern was made from the Division PCOG office.

<b>Program Concerns</b>	1
<b>Area</b>	Enrollment
<b>Details</b>	<ol style="list-style-type: none"> <li>1. LAC has 17 registered occupations, but enrollment was only reported for eight of the occupations.</li> <li>2. During the 2022-23 program year, LAC only had three new apprentices reported in the Information Technology related occupations. Of the three, only two were reported as completers.</li> </ol>
<b>Effectiveness</b>	<ol style="list-style-type: none"> <li>1. Per 29 CFR 26.6(a), "Every registered apprenticeship program must have at least one registered apprentice, except for the following specified periods of time, which may not exceed 1 year: (1) Between the date when a program is registered and the date of registration for its first apprentice(s); or (2) Between the date that a program graduates an apprentice and the date of registration for the next apprentice(s) in the program.</li> </ol>

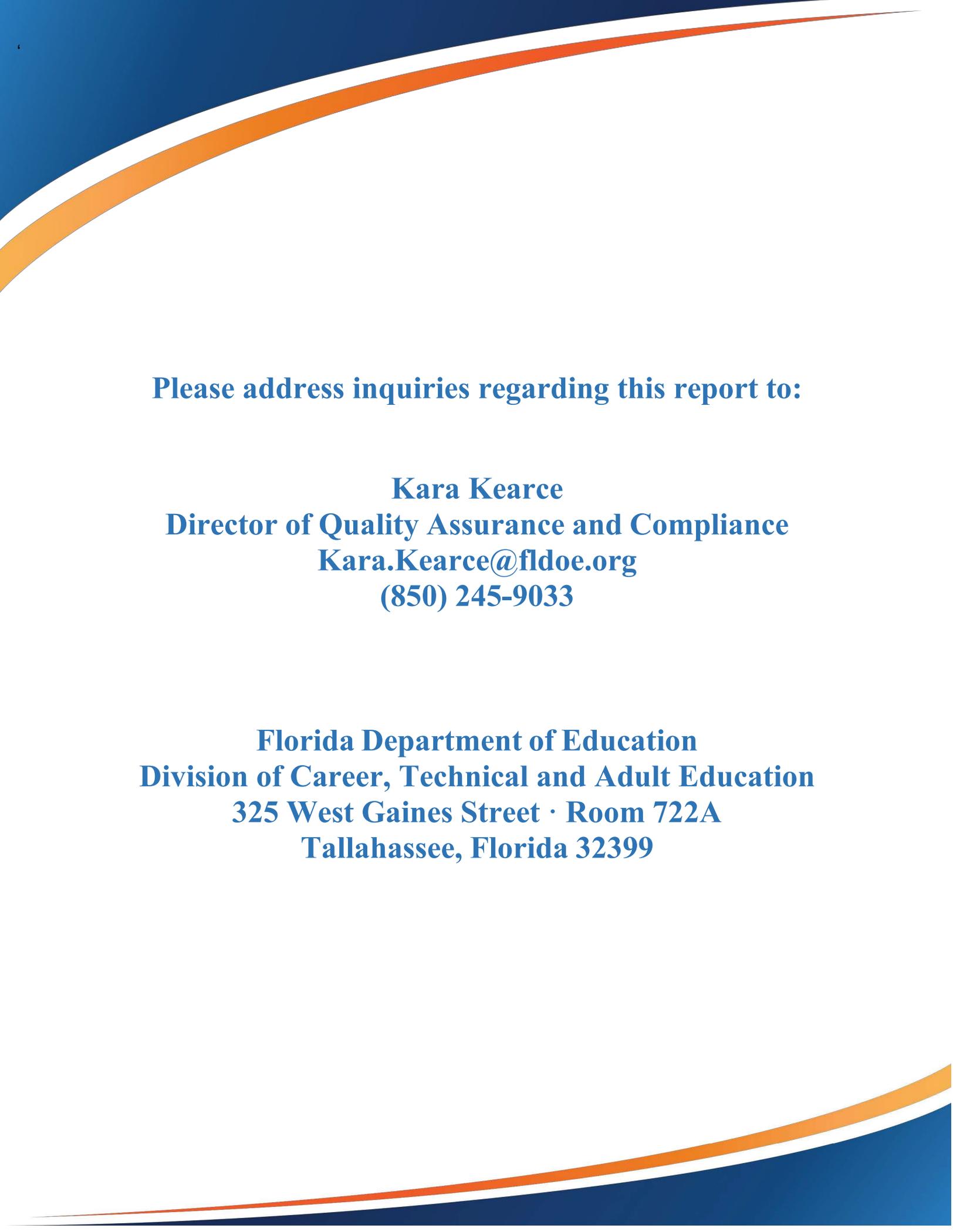
## IX. SUMMARY

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 you can find at:

<https://www.fl DOE.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 LAC monitoring review. A special thanks is offered to Ms. Ruth Tirado for her participation and leadership during this process.



**Please address inquiries regarding this report to:**

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