Today's Agenda

• Welcome and Consortium notes
• Update on DATA Act/UGG workgroup
  • Mark Mahoney, Co-chair, DATA Act/UGG Workgroup
• “Auditing Sub-Recipient Monitoring Activities”
  • Barry Bell, Auditor General’s Office
• “Monitoring – An Audit Focus”
  • LR Weathermon, Jr., Financial Administrator DFS/Bureau of Auditing
• “DOT – Local Programs”
  • Lorraine Moyle, DOT/Local Programs Administrator
• “DCF Monitoring Topics”
  • Dineen Cicco, DCF SAMH Contract Manager
  • Tarha Selvidge, DCF SAMH Contract Manager
Auditing Subrecipient Monitoring Activities

Presented To:
The Florida Grant Consortium

By Barry Bell, CPA
February 15, 2018
IF AUDITORS COULD JUST GO AWAY

THAT'D BE GREAT!
Agenda

• About the Office of the Auditor General
• Pass-Through Entity Responsibilities
• Auditing Subrecipient Monitoring Activities
• Auditor General Report Findings
About the Office of the Auditor General

• The Auditor General is a Constitutional Officer appointed by the Legislature. Our current Auditor General is Sherrill F. Norman, CPA.
• As of October 2017, we had 360 full-time equivalent positions.
• Three Divisions:
  – State Government Audits
  – Educational Entities and Local Government Audits
  – Information Technology Audits
• We conduct financial, compliance, performance, and operational audits of public programs, activities, and functions and information technology systems, in addition to other engagements.
• Web site: FLAuditor.gov
Pass-Through Entity Responsibilities

- 2 CFR 200.331 Requirements for pass-through entities
  - 2 CFR 200.331(a) – Requires the clear identification of the award to the subrecipient by communicating certain information.
  - 2 CFR 200.331(b) – Requires an evaluation of each subrecipient’s risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring.
  - 2 CFR 200.331(d) – Requires the monitoring of subrecipient activities to assure compliance and performance goals are achieved.
  - 2 CFR 200.331(e) – Provides examples of monitoring tools pass-through entities can use to ensure subrecipient accountability and compliance with program requirements and achievement of performance goals.
  - 2 CFR 200.331(f) – Requires pass-through entities to verify that every subrecipient is audited as required by 2 CFR 200 Subpart F.
  - 2 CFR 200.331(g) – Requires that pass-through entities consider whether the results of monitoring activities indicate conditions that necessitate adjustments to the pass-through entities own records.
Auditing Subrecipient Monitoring Activities

• Statewide Federal Awards Audit
  – 2 CFR 200 Subpart F – Audit Requirements
    • Audit required for non-Federal entities expending $750,000 or more during the non-Federal entity’s fiscal year in Federal awards
  – 2 CFR Part 200, Appendix XI: Compliance Supplement, M. Subrecipient Monitoring
    • Information in the compliance supplement drives the audit procedures that we perform.
Auditing Subrecipient Monitoring Activities (Continued)

• Pre-award and award issuance:
  – Did the Agency clearly identify the award to the subrecipient? (2 CFR 200.331(a))
    • Gain an understanding of the Agency’s process for identifying and communicating award information to its subrecipients.
    • Obtain, review, and evaluate Agency grant award documents (e.g., contract, subrecipient agreement, etc.), or other related Agency documents.
    • Inquire with Agency staff and review Agency documents to identify changes to the award that were made during the audit period and determine whether the changes should have been clearly identified to Agency subrecipients.

• During-the-award monitoring:
  – Did the Agency evaluate the subrecipient’s risk of noncompliance (Also can be applied to pre-award)? (2 CFR 200.331(b))
    • Gain an understanding of the Agency’s process for assessing subrecipient risk of noncompliance.
    • Obtain, review, and evaluate Agency documentation evidencing that it evaluated each subrecipient’s risk of noncompliance.
Auditing Subrecipient Monitoring Activities (Continued)

- During-the-award monitoring (continued):
  - Did the Agency monitor subrecipient activities? (2 CFR 200.331(d))
    - Gain an understanding of the Agency’s process for monitoring subrecipients.
      - Financial monitoring
      - Programmatic monitoring
    - Obtain, review, and evaluate Agency documentation evidencing that the subrecipient had been monitored.
      - Was monitoring sufficient to ensure compliance with program requirements?
      - Did the Agency communicate the monitoring results to the subrecipient?
      - Did the Agency followup to ensure that cited deficiencies were timely corrected?
Auditing Subrecipient Monitoring Activities (Continued)

• During-the-award monitoring (continued):
  – Did the Agency ensure that subrecipients obtained the required audits? (2 CFR 200.331(f))
  • Gain an understanding of the Agency’s process for tracking, obtaining, and reviewing subrecipient audits.
• Obtain, review, and evaluate Agency documentation to determine whether the Agency:
  – ensured subrecipients obtained required audits.
  – obtained and reviewed subrecipient audits.
  – issued management decisions, if applicable, and performed followup to ensure the subrecipient took timely and appropriate corrective action on deficiencies.
Auditing Subrecipient Monitoring Activities (Continued)

• Examples of Monitoring Activities (2 CFR 200.331(e))
  – Depending on your risk assessment results, the following activities could be useful to ensure accountability, compliance with program requirements, and achievement of performance goals:
    • Provide subrecipients with training plus technical assistance on program-related matters.
    • Perform on-site reviews of subrecipient operations.
    • Agreed-upon procedures engagements.
Auditing Subrecipient Monitoring Activities (Continued)

• During-the-award monitoring (continued):
  – Did the Agency consider whether the results of monitoring activities indicate conditions that necessitate adjustments to the pass-through entities own records? (2 CFR 200.331(g))
    • Gain an understanding of the Agency’s process for evaluating the effects of subrecipient monitoring on its own records.
    • Obtain and review monitoring documentation to determine whether conditions were noted that would require the Agency to adjust its records.
    • Examine Agency records (e.g., FLAIR, program reports) to determine whether appropriate adjustments were made.
Auditor General Findings

- The State agency did not notify its subrecipients that the terms and conditions of the Federal award had been revised.
- The State agency did not always ensure that required subrecipient audits were completed, timely received, and reviewed and that determinations were made regarding whether management decisions and corrective actions were required.
- The State agency did not always evaluate each subrecipient’s risk of noncompliance.
- State agency records did not evidence that required subrecipient monitoring was sufficient to determine compliance with applicable program requirements.
- The State agency did not always communicate to subrecipients deficiencies identified during monitoring or perform follow-up procedures to determine whether corrective action was implemented for deficiencies identified during the subaward monitoring process.
Final Thoughts

• Document, Document, Document!
• Substance over form.
Questions?

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Monitoring – An Audit Focus

Division of Accounting & Auditing
Bureau of Auditing

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Audit Authority

- 17.03 To audit claims against the state.

- 215.971 Agreements funded with federal or state assistance.
  - (3) Grant Agreements

- 287.136 Audit of executed contract documents.
  - Contracts
17.03 To audit claims against the state.—

(1) The Chief Financial Officer of this state, using generally accepted auditing procedures for testing or sampling, shall examine, audit, and settle all accounts, claims, and demands, whatsoever, against the state, ....

(3) The Chief Financial Officer may adopt and disseminate to the agencies procedural and documentation standards for payment requests and may provide training and technical assistance to the agencies for these standards.
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Agreements funded with federal or state assistance.—

(3) After execution of a grant agreement, the Chief Financial Officer shall perform audits of the executed state and federal grant agreement documents and grant manager’s records in order to ensure that adequate internal controls are in place for complying with the terms and conditions of such agreements and for validation and receipt of goods and services.
215.971 Agreements funded with federal or state assistance.—

(3) After execution of a grant agreement, the Chief Financial Officer shall perform audits of the executed state and federal grant agreement documents and grant manager’s records in order to ensure that adequate internal controls are in place for complying with the terms and conditions of such agreements and for validation and receipt of goods and services.
287.136 Audit of executed contract documents.—

After execution of a contract, the Chief Financial Officer shall perform audits of the executed contract document and contract manager’s records to ensure that adequate internal controls are in place for complying with the terms and conditions of the contract and for the validation and receipt of goods and services.
287.136 Audit of executed contract documents.—

After execution of a contract, the Chief Financial Officer shall perform audits of the executed contract document and contract manager’s records to ensure that adequate internal controls are in place for complying with the terms and conditions of the contract and for the validation and receipt of goods and services.
The Auditors

Department of Financial Services
Division of Accounting & Auditing
Bureau of Auditing
Contract & Grant Management Review Team
aka CMR
The Path to Deliverables

The Statutes

Department of Management Services

Department of Financial Services

Agency Implementation

CFO Jimmy Patronis
(d) Specifying a scope of work that clearly establishes all tasks the contractor is required to perform.

(e) Dividing the contract into quantifiable, measurable, and verifiable units of deliverables that must be received and accepted in writing by the contract manager before payment. Each deliverable must be directly related to the scope of work and specify a performance measure. As used in this paragraph, the term “performance measure” means the required minimum acceptable level of service to be performed and criteria for evaluating the successful completion of each deliverable.

(f) Specifying the criteria and the final date by which such criteria must be met for completion of the contract.
(d) Specifying a **scope of work** that clearly establishes all tasks the contractor is required to perform.

(e) Dividing the contract into **quantifiable, measurable, and verifiable units of deliverables** that must be received and accepted in writing by the contract manager before payment. Each deliverable must be directly related to the scope of work and specify a performance measure. As used in this paragraph, the term **“performance measure” means** the required minimum acceptable level of service to be performed and criteria for evaluating the successful completion of each deliverable.

(f) Specifying the **criteria** and the final date by which such criteria must be met for completion of the contract.
215.971(1) An agency agreement must include . . .

(a) A provision specifying a scope of work that clearly establishes the tasks that the recipient or subrecipient is required to perform.

(b) A provision dividing the agreement into quantifiable units of deliverables that must be received and accepted in writing by the agency before payment. Each deliverable must be directly related to the scope of work and specify the required minimum level of service to be performed and the criteria for evaluating the successful completion of each deliverable.

(c) A provision specifying the financial consequences that apply if the recipient or subrecipient fails to perform the minimum level of service required by the agreement.
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(b) A provision dividing the agreement into **quantifiable units of deliverables** that must be received and accepted in writing by the agency before payment. Each deliverable must be directly related to the scope of work and **specify the required minimum level of service to be performed** and the **criteria for evaluating the successful completion of each deliverable**.

(c) A provision specifying the **financial consequences** that apply if the recipient or subrecipient fails to perform the minimum level of service required by the agreement.
DMS Contract Attestation
Memo No. 01 (2013–14)

The executed attestation shall confirm that the contract or purchase order contains or complies with all of the following:

• A statement of work
• Quantifiable and measurable deliverables
• Performance measures
• Financial consequences for non-performance
The contract manager’s file must contain all documentation that is required by this memorandum and the contract agreement.

The contract file must also document the contract manager’s activities to verify that the deliverables were received and were in compliance with criteria established in the agreement.

The monitoring activities provided by the contract manager must be adequate to provide reasonable assurance that contract deliverables have been provided as required by the agreement.
If, due to a large number of agreements managed by contract managers, the agency conducts periodic monitoring of agreements to validate a provider’s performance, the agency must have a formal contract monitoring process which includes the following components:

- Risk Assessment
- Monitoring Plan
- Monitoring Procedures and Criteria
- Evidence to support conclusions reached during its monitoring process
- Corrective Action Plan (if required)
- Follow-up on Corrective Action (if required)
Contractual service invoices submitted by a provider to an agency for payment processing must clearly identify, at a minimum, the dates of services, a description of the specific contract deliverables provided during the invoice period and the quantity provided, and the payment amount specified in the agreement for the completion of the deliverable(s) provided.

Written certification, from the contract manager, that services were performed in accordance with the contract terms must be provided to the Bureau of Auditing when submitting the request for payment.
Deliverables as stated in the contract:
  • Identify the deliverables as stated in the contract.

Minimum Performance Levels:
  • Identify the minimum levels of service to be completed as stated in the contract.

Payment Amount:
  • Identify the compensation amount for each deliverable.

Type of Services:
  • Provide a brief description of the services being provided.

Method of Payment:
  • Identify the payment method for each deliverable. For example, fixed-price, fixed-rate, cost reimbursement.
DFS Contract Summary Form – Certification

This section is to be completed by the employee designated by the agency to function as the contract manager to certify the information provided on this form is true and accurately reflects the terms and conditions in the executed contract document and approve the identified invoice for payment based on direct knowledge of satisfactory receipt of the goods or services.
What is Monitoring
STATE OF FLORIDA CONTRACT AND GRANT USER GUIDE

Monitoring an agreement is an involved, interactive, and proactive activity. While the provider has responsibility to perform under the terms of the agreement, the state agency has responsibility for reasonable and objective evaluation of the provider’s progress and performance.

Likewise, a provider has the responsibility for monitoring its subrecipients/subcontractors.
Effective monitoring can assist in identifying and reducing fiscal and/or program risks as early as possible; thus, protecting public funds, ensuring the delivery of required services, and providing timely notification to the provider of areas of noncompliance.
Develop a Contract-Specific Monitoring Plan

Monitoring is a planned, ongoing, and periodic activity to determine:

- Compliance by the provider with the contract terms and conditions and any applicable laws and regulations.
- All required activities are being or have been performed in accordance with the agreement.
- Deliverables have been completed.
- Funds have been accounted for and used appropriately, where applicable.
- Program goals and objectives are being met.
Conduct Risk Analysis
STATE OF FLORIDA CONTRACT AND GRANT USER GUIDE

Determine the criteria to be applied in assessing the level of risk. The identified level of risk associated with each agreement will assist in determining the frequency of monitoring, what specific areas of the agreement are to be monitored (objective of the monitoring), and how it is to be monitored.

The risks identified are the basis for the development of the monitoring program.
Conduct Risk Analysis
STATE OF FLORIDA CONTRACT AND GRANT USER GUIDE

The risks identified are the basis for the development of the monitoring program. Some of the factors to be considered in determining risk include:

- Total dollar amount of the agreements;
- Complexity of services;
- Risks to clients and citizens;
- Provider’s experience and expertise;
- Provider’s past performance;
- Recipient or subrecipient determination;
- Program fiscal requirements.
Another Example of Risk Factors

- Contracts with the highest dollar amount
- The types of services
- An established provider
- Management decisions
### Risk Criteria

| Total dollar value of contract: |
|-------------------------------|-------------------|
| 5 = Over $10 million          | 4 = Moderate High Risk |
| 4 = Over $1 million up to $10 million | 3 = Moderate Risk |
| 3 = Over $150,000 up to $1 million | 2 = Moderately Low Risk |
| 2 = $25,000 up to $150,000    | 1 = Low Risk       |
| 1 = Less than $25,000         |                   |

| Complexity:                    |
|-------------------------------|-------------------|
| 5 = Highly complex or technical | 5 = High Risk     |
| 3 = Somewhat complex or technical in nature | 3 = Moderate Risk |
| 1 = Not complex and easily understood | 1 = Low Risk |

| Public Safety:                 |
|-------------------------------|-------------------|
| 5 = Clients or public may be exposed to safety risks | 5 = High Risk     |
| 1 = No client or public safety risks               | 1 = Low Risk |

| Funding Source:                |
|-------------------------------|-------------------|
| 5 = Federal and/or state financial assistance is used | 5 = High Risk     |
| 1 = No federal or state financial assistance is used | 1 = Low Risk |

| Payment method:                |
|-------------------------------|-------------------|
| 5 = Cost reimbursement        | 5 = High Risk     |
| 3 = Fixed rate                | 3 = Moderate Risk |
| 1 = Fixed price               | 1 = Low Risk      |

| Procurement method:            |
|-------------------------------|-------------------|
| 5 = Sole source               | 5 = High Risk     |
| 4 = Emergency procurement, ITN, RFP | 4 = Moderate High Risk |
| 3 = Legislative mandates, exempted services, ITB | 3 = Moderate Risk |
| 2 = HFG (state contract or GSA) | 2 = Moderately Low Risk |
| 1 = Competitive negotiation   | 1 = Low Risk      |

| Provider performance:          |
|-------------------------------|-------------------|
| 5 = Known to be unsatisfactory | 5 = High Risk     |
| 3 = Minimal problems or unknown | 3 = Moderate Risk |
| 1 = Meets expectations        | 1 = Low Risk      |

| Visibility and impact:         |
|-------------------------------|-------------------|
| 5 = Executive importance and impacts multiple business units | 5 = High Risk     |
| 3 = Executive importance or impacts multiple business units | 3 = Moderate Risk |
| 1 = Low executive importance and impacts one unit | 1 = Low Risk |

| Security access and confidential data: |
| 5 = Has access to or is given confidential data | 5 = High Risk |
| 4 = Has access to facilities with confidential data but no direct electronic access | 4 = Moderately High Risk |
| 3 = Access ability uncertain | 3 = Moderate Risk |
| 2 = Has access to facilities but confidential data is segregated | 2 = Moderately Low Risk |
| 1 = No access to facilities or confidential data | 1 = Low Risk |

| Other factors:                 |
|-------------------------------|-------------------|
| a) Significant changes in the business process | 5 = High Risk       |
| b) Staff turnover of key contractual stakeholders | 4 = Moderately High Risk |
| c) Contract manager has other high priority responsibilities | 3 = Moderate Risk |
| d) Security access and confidential data | 2 = Moderately Low Risk |
| e) Total Risk Score            | 1 = Low Risk       |

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**CFO JIMMY PATRONIS**

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**DEPARTMENT OF FINANCIAL SERVICES**

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**An Example**
At its best, risk assessment involves the exercise of judgment by knowledgeable and experienced personnel, recording the decisions for the selection of the risk criteria, evaluating contract/grant agreements against the criteria, documenting the evaluation results, and communicating the results to contract/grant managers and supervisors responsible for monitoring.

Such a process is often ephemeral.

Finding a standard for evaluating agency risk assessments is a work in progress.
A deliverable is an event that triggers a payment. For each task identified in the scope of work there should be an associated deliverable. Deliverables should:

- Be directly related to the scope of work;
- Be used to measure the provider’s progress;
- Be specific, quantifiable, measurable and verifiable;
- Be a necessary part of the provider’s performance;
- Be identified in the agreement along with a description of what constitutes successful performance of the event;
- Include minimum performance standards.
Contract Deliverables Monitoring
– All These Many Ways to Say Deliverables –

- Adequate Internal Controls
- Scope of Work
- Tasks
- Validation and Receipt
- Statement of Work
- Quantifiable Units
- Criteria for Evaluating
- Evidence to support conclusions
- Closeout
- Written Certification
- Financial Consequences
- Adequate Internal Controls
- Minimum Level of Service

C F O  J I M M Y  P A T R O N I S
Contract Deliverables Monitoring – From All That to Auditor Language –

Contract Monitoring Processes
Consistent, high-quality monitoring process for contract deliverables and payments.

An appropriate level of oversight and control over:
- The accomplishment and receipt of significant deliverables, and
- The authorization of payments for invoiced deliverables.
Contract Deliverables Monitoring  
– Audit Focus –

Has agency management established and implemented contract monitoring processes that promote an appropriate level of oversight and control over the accomplishment and receipt of significant deliverables and the authorization of payments for invoiced deliverables?
Audit Focus

Policies & Procedures

Current written policies and procedures that serve as a guide to agency personnel in ensuring a consistent, high-quality monitoring process for contract deliverables and payments.
Audit Focus
Communication

Communication with monitoring staff and contract managers to provide them the appropriate background knowledge related to:

- Agency contract types and procurement methods.
- The establishment, recording, and communication of contract deliverables.
- Suggested activities and methods for obtaining evidence of the accomplishment and receipt of contract deliverables.
- Requirements for intra-agency communication of monitoring results.
- Responsibilities of agency staff designated to receive those results.
Audit Focus
Monitoring Activities and Methods

Oversight of contract managers to provide assurance that their monitoring activities and methods include:

- Monitoring the accomplishment and receipt of significant deliverables against contracted expectations for quality, quantity, and timeliness.

- Prior to authorizing payments for invoiced deliverables, requiring of the contractor appropriate support (analyses, auditable documentation, etc.) to reasonably evidence that invoiced deliverables were accomplished and received.

- For instances where invoiced deliverables do not meet contracted expectations for quality, quantity, and timeliness, developing and enforcing needed corrective actions and applying any financial consequences required by the contract agreements.
Grant Closeout

For contracts related to state financial assistance, has agency management established and implemented a grant closeout process that includes:

• A final reconciliation report that evidences a reconciliation and verification of all funds received against all funds expended during the contract period.

• An analysis of contract advances and related interest, excess payments, unallowable costs, non-expendable property, etc., and documentation of the agency’s recovery or disposition of funds due.
Grant Closeout

For contracts related to state financial assistance, has agency management established and implemented a grant closeout process that includes:

- An evaluation of whether final contractor representations regarding the completeness of required deliverables could be demonstrated by review and analysis of contractor and agency records, properly auditable, retained, and accessible.

- A summary conclusion (the contract manager’s written certification) as to whether the significant contract deliverables were accomplished by the contractor and received by the agency in accordance with contracted expectations for quality, quantity, and timeliness.
Contract Deliverables Monitoring
– Audit Focus –

Has agency management established and implemented contract monitoring processes that promote an appropriate level of oversight and control over the accomplishment and receipt of significant deliverables and the authorization of payments for invoiced deliverables?
Questions?

Division of Accounting & Auditing
Bureau of Auditing

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What are Local Programs?

GRANT programs that:
- provide reimbursement for transportation improvements
- with state or federal funds
- for projects delivered by local agencies in the State of Florida.

Project eligibility is based on:
- Fund source
- Fund type
- Project Scope
FDOT Organizational Structure

<table>
<thead>
<tr>
<th>CENTRAL OFFICE</th>
<th>DISTRICT HEADQUARTERS</th>
<th>DISTRICT URBAN AREA OFFICES</th>
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<td>• - Tallahassee</td>
<td>District 1 - Bortow</td>
<td>District 1 - Ft. Myers</td>
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<td>District 2 - Lake City</td>
<td>District 2 - Jacksonville</td>
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<td>District 3 - Chipley</td>
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<td>District 6 - Miami</td>
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<td>District 7 - Tampa</td>
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Florida's Turnpike Enterprise

Map of Florida showing districts and urban area offices.
Who Can Apply for Funds?

Agency eligibility is based on:

- Fund source – state or federal
- Fund type – program as set forth by laws and rules
- Project Scope – matches eligibility criteria
Local Programs by the Numbers

2018-2022 Adopted 5 Year Work Program:

- Projected 1102 unique projects
- Commitments of $1.2 Billion

That’s an average of 16.4 projects per County or 2.7 projects in every city in Florida!
Managing Risk

- FDOT HQ
- FDOT District Offices
- Federal Highway Administration
- Contractors/Consultants
- Other Government Agencies
- Local Agencies

Partnerships are built on trust.
Managing Risk

Single Point of Contact for internal and external staff.

Established Points of Contact familiar with delivery of local projects.

All the players!

- Design Review
- Environmental Certification
- Right of Way Certification
- Construction Review
- Contractors
- Consultants

District Local Programs Administrator

FDOT Project Managers

Local Agency Project Managers
Monitoring

Programmatic State Level

- Manuals
- Quarterly statewide coordination meetings
- Training (mandatory)
- Stakeholder Partnering
- Performance Measures for dollars and contract numbers
- Boilerplates- invoices, progress reports, contracts
Monitoring

Programmatic District Level

- Contract reviews
- Monthly or Quarterly coordination meetings
- Invoice processing—may require site visits
- Design Plan reviews and approvals
- Construction site visits
- Performance Evaluations of locals
Verification of local contract changes for time and price.

Assessment of liquidated damages

Substantial and final inspections

Certifications signed by licensed professionals

Verification of final payments to contractors and subs

Project Close Out
QUESTIONS?
Local Agency Links and Resources

FDOT Local Programs Webpage
http://www.fdot.gov/programmanagement/lp/Default.shtm

LAP Training
http://www.fdot.gov/programmanagement/LAP/LAPTraining.shtm
DCF Monitoring

- Dineen Cicco, DCF/SAMH Contract Manager

- Tarha Selvidge, DCF/SAMH Contract Manager
DCF Monitoring Topics

- Overview
- Planning
- Preparation
- Engagement
- Report
- Follow-Up
Overview

- Contract Oversite Unit
  - Chapter 402.7305(4) F.S.
  - Governed by CFOP 75-8
- Contract Manager Monitoring
  - Programmatic Monitoring
  - Physical Plant Monitoring
Planning

- Risk Assessment
- Review of Prior Corrective Actions
- Development of the Monitoring Scope
  - Monitoring Plan
  - Team Assignments
  - Monitoring Team Meetings
Monitoring Preparation

- Engagement Letter
- Request for Documents
- Tool Development
- Sample Selection
On-Site Monitoring

- Review of Documents/Files
- Interviews
- Observation
- Monitoring Documentation
Report

- Exit Conference
- Issue Written Report (30 days)
  - Summary of Review
  - Findings
  - Opportunity for Improvement
  - Strengths
- Request for Corrective Action Plan (CAP)
- Contract Evaluation and Reporting System (CERS)
Follow-Up

- Review and Acceptance of CAP
- Tracking of CAP
  - CERS Updates
  - Supporting Documentation for CAPs
  - CAP Closeout
Questions???