

COLORADO COMMUNITY COLLEGE SYSTEM

PRESIDENT'S PROCEDURES

MONITORING OF FEDERAL AND STATE PROGRAMS

SP 9-73

EFFECTIVE: March 1, 2009

REFERENCES: C.R.S. 23-8-102 (Career Technical Act); P.L. 109-270 (Carl D. Perkins Act of 2006); P.L. 93-112, section 504

APPROVED: February 11, 2009

ISSUED BY:

Nancy J. McCallin, System President

Application

The procedure applies to the state system community colleges and all secondary and postsecondary institutions that receive federal and/or state career and technical education funding.

Basis

Board Policy 9-73 requires the System President to promulgate procedures necessary to implement the CCCS monitoring program

Guidelines

This procedure provides guidance for implementation of the compliance monitoring program.

1. CCCS will conduct technical assistance monitoring activities for educational institutions to evaluate the effectiveness of their compliance with all relevant rules and regulations that relate to a) the Carl D. Perkins Act, b) Career and Technical Education programs, c) the Colorado Vocational Act, and d) Compliance with Title VI, IX and Section 504 (MOA).
2. CCCS will implement a risk-based matrix methodology for determining which educational institution will receive an on-site monitoring visit and the timing of that visit. The underlying methodology will incorporate the following factors:
 - a. A ranking from low to medium to high of the subrecipient's risk based on their Perkins award dollar amount.

- b. A ranking from low to medium to high of the subrecipient's risk based on their % of Perkins state allocation.
 - c. A ranking from low to medium to high of the educational institution's risk based on their CTA dollar amount.
 - d. A ranking from low to medium to high of the educational institution's risk based on their % of CTA allocation.
 - e. A ranking from low to high of the educational institution's risk based on their most recent audit. For system colleges, the CCCS Compliance & Technical Audit will be evaluated. For non system colleges and school districts the A-133 Audit will be evaluated.
 - f. A ranking from low to medium to high of the educational institution's risk based on a composite of subjective risk evaluations including:
 - i. The level of accuracy and completeness of the Local Plan as evaluated by the Perkins Director.
 - ii. The level of accuracy and completeness of the Local Improvement Plan, as evaluated by the Perkins Director.
 - iii. The timing of the most recent prior on site monitoring visit
 - iv. The accuracy of the most recent final CTA report as evaluated by the CCCS Internal Audit Department.
 - v. The level of timepieces, reliability and accuracy of the VE130/135 data as evaluated by our Director CTE Accountability
 - vi. The quality of the CTE programs as evaluated by Subject Matter Experts (SME).
 - vii. A general evaluation of risk as determined by the CCCS Internal Audit department based on CTA desk audits
3. Using the risk-based grid, CCCS will determine a schedule of onsite visits for each fiscal year. Five percent of sub-recipients will be scheduled for a monitoring visit annually. A CCCS compliance officer will perform the onsite visit using a pre-defined onsite monitoring checklist.
4. All subrecipients must submit either an annual OMB Circular A-133 audit or a statement attesting that they are not subject to OMB Circular A-133 audit requirements prior to the posting of the institution's Perkins Voucher. The Compliance Manager or designee will review each A-133 audit using a pre-designed checklist. All audit findings will be documented as a corrective measure on the Perkins' Report and calculated in the risk-based grid.
5. The risk-based grid will be evaluated annually.