

**The District Board of Trustees of Tallahassee Community
College (TCC) CDBG-DR Workforce Recovery Training Program**

Policies and Procedures

This document is provided as a reference for participants of The District Board of Trustees of Tallahassee Community College (TCC) Workforce Recovery Training Program (WRTP) to locate and access the WRTP policies and procedures. TCC WRTP ensures adherence to the requirements of the Subrecipient Agreement, the WRTP Guidelines for Hurricane Michael and the Rebuild Florida WRTP Policies and Procedures for Hurricane Michael.

TCC WRTP has policies and procedures formally documented here and are available to applicants, participants and the general public and can be accessed on the TCC WRTP website dedicated to activities delivered through the WRTP. Alternatively, a PDF copy is available upon request to the Program Director via email at Rebuild@tcc.fl.edu.

TCC WRTP ensures compliance with the Subrecipient Agreement and all Subrecipient Activities by adhering to Rebuild Florida WRTP Guidelines and all applicable federal regulations and the Florida Department of Economic Opportunity (“DEO”) policies. Any updates with respect to the current status and progress of the Subrecipient and all subcontractors in completing the work described in the Scope of Work and the expenditure of funds under this agreement shall be reported to DEO in the monthly reports as required by the agreement.

Any changes to the Subrecipient’s staffing plan, including changes to the organizational chart and/or job descriptions for Subrecipient employees and contracted staff who will implement and/or support program activities are subject to approval by DEO and must be submitted to the DEO Grant Manager at least thirty (30) calendar days before the proposed effective date of the change.

Any changes to the Subrecipient’s offered construction trades training programs, time frame or training for each program, the relevant industry standards the curriculum for each program meets, or certification(s) and/or credential(s) each participant should be prepared and qualified to obtain are subject to approval by DEO and must be submitted to the DEO Grant Manager at least thirty (30) calendar days before the proposed effective date of the change.

The Subrecipient must request approval from the DEO Grant Manager, in writing, a minimum of thirty (30) calendar days prior to making a change, addition, or deletion in the service locations.

Subrecipient staff shall provide staff and contracted staff with information (and training upon need and/or request) on relevant issues, such as program requirements, policies and procedures and changes communicated by DEO on federal or DEO guidance as it is released or during periodic scheduled monitoring.

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All policies and procedures must comply with the Program Guidelines and all applicable federal regulations and DEO policies and are subject to approval by DEO. **The Subrecipient may not begin processing applications until the Subrecipient's policies and procedures have been reviewed and approved by DEO.**

Application and Intake

Participant Application: Individuals seeking to receive training, support services, or other benefits through the WRTP must complete an official WRTP application. This application may be found and completed by:

- Going online to www.RebuildFlorida.gov;
- Visiting a TCC office location;
- Contacting TCC by phone for additional assistance with the application portal.

Tallahassee Community College

444 Appleyard Drive
Tallahassee, FL 32304

Phone – (833) TCC-JOBS

TCC Contact Information can also be found on www.RebuildFlorida.gov.

To qualify for this program, you must:

- Be eligible to work in the United States.
- Provide documentation establishing proof of identity.
- Be at least 18 years of age or older.

Qualifications will be certified by program staff prior to the commitment of training, job readiness, or other assistance to any participant.

Individuals are not guaranteed assistance, but will be served based on availability of funds and qualification for benefits.

Applications will only be accepted during the published outreach period or until the target number of applications is received. Additional intake periods may be opened at a later date depending on funding availability for training and employment assistance for additional participants.

Participant income must be verified before eligibility is determined for the WRTP. Income eligibility is determined based on total household income and total household size. Income is calculated and verified using the following criteria:

Annual income as reported under the Census long-form for the most recent available decennial Census. This definition includes:

- (A) Wages, salaries, tips, commissions, etc.;
- (B) Self-employment income from own nonfarm business, including proprietorships and partnerships; (C) Farm self-employment income;
- (D) Interest, dividends, net rental income, or income from estates or trusts;
- (E) Social Security or railroad retirement;

(F) Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs; Workforce Recovery Training Program Guidelines v1.5 effective 05-08-20 26 (G) Retirement, survivor, or disability pensions; and

(H) Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony.

Applications are reviewed by TCC. TCC makes the determination on eligibility based on these program guidelines and TCC policies and procedures through subcontractor's review/recommendation.

Certification requirements to receive assistance:

All participants must agree to the following to receive assistance:

- Sign a release so that information provided by the participant can be shared with state and federal agencies and certain third parties in order to verify information given to the program. The participant and everyone 18 and older in the household are required to sign the release.
- Swear to the accuracy and completeness of all information provided to the program under penalty of law.
- Sign a subrogation agreement acknowledging that any overpayment of benefits will be subject to recapture.

Only completion and submission of the Rebuild Florida WRTP participant application, including the submission of all supporting documentation, will be considered as an individual's application for program services and benefits.

Any additional information or institution-specific forms utilized by the Subrecipient may be requested, but may not be required.

Prioritization (Priority Schedule)

Completed Participant applications will be accepted and eligibility for services and benefits will be determined on a priority schedule.

1. LMI Limited Clientele prioritization

At least 51% of individuals served must meet LMI requirements based on total household income and total household size for the program to meet the LMI national objective. Definitions provided in Section 102(a)(2) of the HCDA define the term “low- and moderate-income persons” as families and individuals whose incomes are no more than 80 percent of the median income of the area involved. See Appendix A for a table of 2020 HUD income limits for Florida.

- TCC will prioritize applicants whose income meets LMI limits

2. Veterans and eligible veteran spouses and dependents will receive priority in accordance with federal regulations.

3. Section 3 Prioritization

The Housing and Urban Development Act of 1968, Section 3, mandates that recipients of CDBG-DR funding provide, to the greatest extent possible, training, employment, contracting, and other economic opportunities to low- and very low-income persons or business concerns that provide economic opportunities to low- and very low-income persons. Subrecipients will be required to demonstrate efforts to recruit and target residents receiving public housing assistance and other low- and very-low-income persons.

- TCC will prioritize residents receiving public housing assistance and other low and very low-income persons for program participation.
- TCC will prioritize candidates who intend to work for businesses supported by or working on CDBG-DR funded projects

The TCC WRTP assigns LMI applicants the highest priority group (level), with a minimum overall program goal of 51%. Only unless an applicant qualifies in additional categories of priority, will they receive higher priority group (level) than LMI. Veterans are the next highest priority group (level) followed by Section 3 priority group (level). The priority deadline for completed priority applications is twenty (20) days prior to the start of the program for each term.

Duplication of Benefits

Duplication of Benefits Overview:

Eligible participants may have previously received assistance from other sources for the same purpose as the WRTP. Under the requirements of The Robert T. Stafford Disaster Assistance and Emergency Relief Act, as interpreted and applied by HUD, DEO, and its sub recipients must take into account certain aid received by a person or entity in determining the amount of assistance which can be granted.

- TCC policies and procedures are consistent with the requirements set forth by the Department of Housing and Urban Development notice CDBG FR-6169-N-01 – *HUD’s Duplication of Benefits Guidance* and the Florida’s Department of Economic Opportunity, *Rebuild Florida Workplace Recovery Training Program* – Part 4.1 and 4.2
- TCC will conduct individualized review of each applicant to determine that the amount of assistance will not cause a duplication of benefits by exceeding the unmet needs of that applicant, both at intake and during programming.
- TCC will estimate the applicant’s total need and total assistance, including determining whether the applicant received FEMA, SBA, insurance, and any other major forms of assistance including but not limited to other local, state, or federal programs, private or non-profit charitable organizations and other assistance received for the purpose for which the participant is applying for, and receiving, funding or services. Application information must be complete and as accurate as possible. The Rebuild Florida program will verify all information. It is important that the names and addresses of all providers are accurate in order to complete the application process. An application may not be processed if the information provided cannot be verified. [TCC] WRTP will verify any amount(s) received that were disclosed by the participant within the WRTP application by utilizing the contact information for the given organization or from the supporting documentation.
- TCC will determine which sources it must exclude as non-duplicative for the DOB calculation, which includes funds that are (1) provided for a different purpose; or (2) provided for the same purpose (eligible activity), but for a different, allowable use (cost).
- In adhering to the CDBG-DR Workforce Recovery Training regulations and guidance, [TCC] WRTP will ensure all participants, prior to receiving assistance, sign a subrogation agreement acknowledging that any overpayment of benefits will be subject to recapture. Additionally, TCC WRTP agrees to assist and cooperate with DEO should DEO elect to pursue any of the claims for benefits or reimbursement under Federal, State or private sources as stated in the Subrogation Agreement. Any overpayment discovered will be recaptured utilizing TCC normal collection procedures.
- The process for recapturing funds is as follows:

1. Notification to participant of overpayment: The TCC WRTP staff will immediately notify recipients upon discovery of a Duplication of Benefit.
 - a. Delivery will be by registered/certified mail, or other verifiable means.
 - b. Notices will:
 - i. Specify in detail the reason(s) that assistance was deemed duplicative;
 - ii. State the amount of duplicative assistance to be repaid;
 - iii. Offer a meeting to discuss the basis for claim, and give recipient an opportunity to provide facts, figures, written records, or other information that may affect the duplication determination:
 - iv. Outline recipient appeal rights;
 - v. Specify the address responses must be delivered to;
 - vi. Clearly state that failure to submit written response within 15 business days of notice receipt may result in processing the full amount sought.
 2. Repayment Options: Recipients can repay in a lump-sum payment of the entire amount due, or enter into a repayment agreement. This formal document is signed by both parties, and stored in the TCC record system. The agreement specifies:
 - a. Amount to be paid, including processing fees.
 - b. Payment schedule: specific due dates and number of months.
 - c. Address for payments to be received.
 - d. Consequences for delinquent or defaulted payments.
 3. General Administrative procedures for collection: If payment has not been received by the final deadline, the account is turned over to our collection agency and no further collection efforts are made by the Accounts Receivable Office. Collections may be done internally or by contracting a private collection agency.
- ☐ If any knowingly false information is found on the applicant's intake it will result in expulsion from program and/or other actions as required.

Income Self Certification

CDBG regulations permit self-certification of income for public service activities as referenced in 24 CFR 570.506(b). TCC has policies and procedures relating to participant income self-certification as follows:

WARNING: The information provided on this form is subject to verification by HUD at any time, and Title 18, Section 1001 of the U.S. Code states that a person is guilty of a **felony** and assistance can be terminated for knowingly and willingly making a false or fraudulent statement to a department of the United States Government.

The income definition includes:

(A) Wages, salaries, tips, commissions, etc.;

(B) Self-employment income from own nonfarm business, including proprietorships and partnerships;
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(C) Farm self-employment income;

(D) Interest, dividends, net rental income, or income from estates or trusts;

(E) Social Security or railroad retirement;

(F) Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;

(G) Retirement, survivor, or disability pensions; and

(H) Any other sources of income received regularly, including Veterans' (VA) payments, unemployment compensation, and alimony. Income eligibility is determined based on total household income and total household size.

Applicants must certify that this information is complete and accurate, applicants agree to provide, upon request, documentation on all income sources to the HUD Grantee/Program Administrator.

Program staff will use the provided documentation that the beneficiary is low-and moderate-income before CDBG-DR assistance is provided. Re-qualification of income is not required after assistance begins.

Eligibility Screening Process and Determination

Applications are reviewed for eligibility and determination by TCC's subcontract. The subrecipient follows the established policies and procedures for eligibility screening and determination in place and within these program guidelines to make the determinations.

Basic Eligibility requirements

To qualify for this program, you must:

- Be eligible to work in the United States.
- Provide documentation establishing proof of identity.
- Be at least 18 years of age or older

Determination is made based on having met all eligibility requirements, provided all supporting documentation and the consideration of Priority Schedule.

Priority Schedule:

- Prioritization for WRTP services and benefits for Veterans and eligible spouses and dependents, in accordance with federal regulations.
- Prioritization based on income or limit eligibility based on income, if applicable.

Notification Procedures:

TCC WRTP process to notify applicants in writing of the eligibility determination of either acceptance, waitlist or rejection will be accomplished through email to the participant prior to the start of the program.

Additionally, TCC WRTP staff will maintain a log of eligibility determinations on all applications received.

All applicants should be informed of the requirement that eligibility determination is an inherently governmental function that must be carried out by a governmental entity.

Language Access Policy

From early childhood through postsecondary education, immigrants and their children face unique challenges and barriers in educational attainment and access to college compared to their native-born peers. The complexities surrounding language, culture, and learning are met with awareness and understanding at the [TCC] WRTP in order to meet the needs of linguistically and culturally diverse learners. [TCC] WRTP addresses the gaps that can re-emerge in postsecondary education, and capacity issues and needs for language programs and workforce and vocational training through the following accommodations:

1. The following are available in English, Spanish, and Haitian Creole:
 - Native language written assessments are available to individuals in need
 - Native language written applications packets are available to individuals in need
2. Strategies are in place to make the curriculum accessible to diverse students including those with various disabilities and LEP (Limited English Proficient) students including but not limited to practical experience in curriculum, instruction and assessment are provided.
3. Participants may utilize appropriate adaptations and accommodations such as separate testing sessions for LEP students, flexible scheduling, small group administration, simplified directions, audiotaped versions, and native language glossaries.

An LEP Assessment will be conducted with specific criterion used to determine the participant's recommended accommodations. Total English language proficiency, time in U.S. or school district, previous teacher/administrator recommendations, previous special program participation are all contributing factors for accommodations.

Any accommodations related to Language Access that an individual may need to participate in the WRTP may be requested to the WRTP staff. **Contact information for the WRTP Program Director** can be found below and on the TCC website, and employee, student and faculty handbooks.

TBD (Grant funded position), Program Director
Address: 444 Appleyard Drive
Tallahassee, FL 32304
Email Address:TBD@tcc.fl.edu
Phone: (833)TCC-JOBS

Compliance Requirements

Compliance Requirements Applicable to the Federal Resources Awarded Pursuant to this Agreement are as Follows:

Federal Program

1. The Subrecipient shall perform its obligations in accordance with Sections 290.0401- 290.048, F.S.
2. The Subrecipient shall perform its obligations in accordance with 24 C.F.R. §§ 570.480 – 570.497.
3. The Subrecipient shall perform the obligations as set forth in this Agreement, including any attachments or exhibits thereto.
4. The Subrecipient shall perform the obligations in accordance with chapter 73C-23.0051(1) and (3), F.A.C.
5. The Subrecipient shall be governed by all applicable laws, rules and regulations, including, but not necessarily limited to, those identified in Award Terms & Conditions and Other Instructions of the Subrecipient's Notice of Subgrant Award/Fund Availability (NFA).

The Subrecipient shall retain sufficient records to show its compliance with the terms of this Agreement and the compliance of all subrecipients, contractors, subcontractors and consultants paid from funds under this Agreement for a period of six (6) years from the date DEO issues the final closeout for this award. The Subrecipient shall also comply with the provisions of 24 CFR 570.502(a)(7)(ii). The Subrecipient shall further ensure that audit working papers are available upon request for a period of six (6) years from the date DEO issues the final closeout of this Agreement, unless extended in writing by DEO. The six-year period may be extended for the following reasons: 1. Litigation, claim or audit initiated before the six-year period expires or extends beyond the six-year period, in which case the records shall be retained until all litigation, claims or audit findings involving the records have been resolved. 2. Records for the disposition of non-expendable personal property valued at \$1,000 or more at the time of acquisition shall be retained for six (6) years after final disposition. 3. Records relating to real property acquired shall be retained for six (6) years after the closing on the transfer of title.

Within sixty (60) calendar days of the close of DEO's fiscal year, on an annual basis, the Subrecipient shall electronically submit a completed Audit Compliance Certification to audit@deo.myflorida.com, and DEO's Grant Manager; a blank version of which is attached hereto as Attachment J. The Subrecipient's timely submittal of one completed Audit Compliance Certification for each applicable fiscal year will fulfill this requirement within all agreements (e.g., contracts, grants, memorandums of understanding,

memorandums of agreement, economic incentive award agreements, etc.) between DEO and the Subrecipient.

General Compliance:

The Subrecipient shall comply with the requirements of Title VI of the Civil Rights Act of 1964 (P.L. 88-352), as amended. No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity funded by this Agreement. The specific nondiscrimination provisions at 24 CFR 1.4 apply to the use of these funds. The Subrecipient shall not intimidate, threaten, coerce or discriminate against any person for the purpose of interfering with any right or privilege secured by title VI of the Civil Rights Act of 1964 or 24 CFR part 1, or because he has made a complaint, testified, assisted or participated in any manner in an investigation, proceeding or hearing under 24 CFR part 1. The identity of complainants shall be kept confidential except to the extent necessary to carry out the purposes of 24 CFR part 1, including the conduct of any investigation, hearing or judicial proceeding arising thereunder.

The Subrecipient shall comply with the provisions of Section 3 of the Housing Urban Development Act of 1968, as amended, 12 USC 1701u, and implementing its implementing regulations at 24 CFR part 135. The DocuSign Envelope ID: D75812FF-937A-433A-BE0D-819F642F053E DocuSign Envelope ID: D75812FF-937A-433A-BE0D-819F642F053E DEO Agreement No.: I0099 Page 44 of 66 Subrecipient shall include the following "Section 3 clause" at 24 CFR 135.38 in every "Section 3 covered contract" (as defined in 24 CFR 135.5).

PART V: RECORD RETENTION. The Subrecipient shall retain sufficient records demonstrating its compliance with the terms of this Agreement for a period of five (5) years from the date the audit report is issued, or six (6) state fiscal years after all reporting requirements are satisfied and final payments have been received, whichever period is longer, and shall allow DEO, or its designee, CFO, or Auditor General access to such records upon request. The Subrecipient shall ensure that audit working papers are made available to DEO, or its designee, CFO, or Auditor General upon request for a period of six (6) years from the date the audit report is issued, unless extended in writing by DEO. In addition, if any litigation, claim, negotiation, audit, or other action involving the records has been started prior to the expiration of the controlling period as identified above, the records shall be retained until completion of the action and resolution of all issues which arise from it, or until the end of the controlling period as identified above, whichever is longer.

A copy of the Audit Compliance Certification form, Attachment J, must be emailed to audit@deo.myflorida.com within sixty (60) calendar days of the end of each fiscal year in which this subgrant was open.

Procurement Policy and Procedure Plan

POLICY 6325 - PROCUREMENT – FEDERAL GRANTS/FUNDS

Procurement of all supplies, materials, equipment, and services paid from Federal funds or College matching funds shall be made in accordance with all applicable Federal, State, and local statutes and/or regulations, the terms and conditions of the Federal grant, The District Board of Trustees (Board) policies, and administrative procedures.

The President shall have and use a procurement and contract administration system in accordance with the USDOE requirements (2 C.F.R. 200.317-.326) for the administration and management of Federal grants and Federally-funded programs. The College shall maintain oversight that requires contractors to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Except as otherwise noted, procurement transactions shall conform to the provisions of the College's documented general purchasing Policy 6320.

The College shall take affirmative steps to assure that small and minority businesses, women's business enterprises, and labor surplus area firms are used when possible in accordance with 2 C.F.R. 200.321.

All College employees, officers, and agents who have purchasing authority shall abide by the standards of conduct covering conflicts of interest and governing the actions of its employees, officers, and agents engaged in the selection, award, and administration of contracts as established in Policy 1140, Policy 2140 and Policy 3140.

The College will avoid acquisition of unnecessary or duplicative items. Additionally, consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase. And, where appropriate, an analysis shall be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach. These considerations are given as part of the process to determine the allowability of each purchase made with Federal funds.

To foster greater economy and efficiency, the College may enter into State and local intergovernmental agreements where appropriate for procurement or use of common or shared goods and services.

Competition

All procurement transactions for the acquisition of property or services required under a Federal award paid from Federal funds or College matching funds shall be conducted in a manner that encourages full and open competition and that is in accordance with good administrative practice and sound business judgment. In order to promote objective contractor performance and eliminate unfair competitive advantage, the College shall exclude any contractor that has developed or drafted specifications, requirements, statements of work, or invitations for bids or requests for proposals from competition for such procurements.

Some situations considered to be restrictive of competition include, but are not limited to, the following:

- A. Unreasonable requirements on firms in order for them to qualify to do business;
- B. Unnecessary experience and excessive bonding requirements;
- C. Noncompetitive pricing practices between firms or between affiliated companies;
- D. Noncompetitive contracts to consultants that are on retainer contracts;
- E. Organizational conflicts of interest;
- F. Specification of only a brand name product instead of allowing for an equal product to be offered and describing the performance or other relevant requirements of the procurement; or
- G. Any arbitrary action in the procurement process.

Further, the College does not use statutorily or administratively imposed State, local, or tribal geographical preferences in the evaluation of bids or proposals, unless (1) an applicable Federal statute expressly mandates or encourages a geographic

preference; or (2) the College is contracting for architectural and engineering services, in which case geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

To the extent that the College uses a pre-qualified list of persons, firms, or products to acquire goods and services that are subject to this policy, the pre-qualified list includes enough qualified sources as to ensure maximum open and free competition. The College allows vendors to apply for consideration to be placed on the list annually.

The College shall require that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to provide maximum open and free competition. The College shall not preclude potential bidders from qualifying during the solicitation period.

Solicitation Language (Purchasing Procedures)

The College shall have written procurement procedures that require that all solicitations made pursuant to this policy incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product, or service to be procured and, when necessary, shall set forth those minimum essential characteristics and standards to which it shall conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible.

When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a brand name or equivalent description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which shall be met by offers shall be clearly stated; and identify all requirements which the offerors shall fulfill and all other factors to be used in evaluating bids or proposals.

The Board will not approve any expenditure for an unauthorized purchase or contract.

Procurement Methods

The College shall have and use the documented procedures consistent with the standards described above for the following methods of procurement:

A. Informal Procurement Methods

When the value of the procurement for property or services under a Federal award does not exceed the simplified acquisition threshold, or a lower threshold established by the State, formal procurement methods are not required. The College may use informal procurement methods to expedite the completion of its transactions and minimize the associated administrative burden and cost. The information methods used for procurement of property or services at or below the simplified acquisition threshold include:

1. Micro-purchases

Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$10,000 for supplies and services; and less than \$2,000 for construction related purchases. To the maximum extent practicable, the College should distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be made without soliciting competitive quotations if President considers the price to be reasonable based on research, experience, purchase history or other relevant information and documents are filed accordingly. The College shall maintain evidence of this reasonableness in the records of all purchases made by this method.

2. Small Purchases

Small purchases include the acquisition of property services, the aggregate dollar amount of which is higher than the micro-purchase threshold but does not exceed the simplified acquisition threshold of \$50,000. Small purchase procedures require that price or rate quotations shall be obtained from an adequate number of qualified sources.

The College is responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk, and its documented procurement procedures which must not exceed the threshold established in the

Federal Acquisition Regulations (FAR). When applicable, a lower simplified acquisition threshold used by the non-Federal entity must be authorized or not prohibited under State, local or tribal laws or regulations.

B. Formal Procurement Methods

When the value of the procurement for property of services under a Federal award exceeds the simplified acquisition threshold, or a lower threshold established by the State, formal, procurement methods are required. Formal procurement methods require following documented procedures. Formal procurement methods also require public advertising unless a non-competitive procurement method can be used in accordance with the standards on competition in 200.319 or non-competitive procurement. The formal methods of procurement are:

1. Sealed Bids

Sealed, competitive bids shall be obtained when the purchase of, and contract for, single items of supplies, materials, or equipment which amounts to more than \$65,000 and when the Board determines to build, repair, enlarge, improve, or demolish a College building/facility.

In order for sealed bidding to be feasible, the following conditions shall be present:

- a. A complete, adequate, and realistic specification or purchase description is available;
- b. Two (2) or more responsible bidders are willing and able to compete effectively for the business; and
- c. The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

When sealed bids are used, the following requirements apply:

- a. Bids shall be solicited in accordance with the provisions of State law and Policy 6320. Bids shall be solicited from an adequate number of qualified suppliers, providing sufficient response time prior to the date set for the opening of bids. The invitation to bid shall be publicly advertised;
- b. The invitation for bids will include product/contract specifications and pertinent attachments and shall define the items and/or services required in order for the bidder to properly respond;
- c. All bids will be opened at the time and place prescribed in the invitation for bids. Bids will be opened publicly;
- d. A firm fixed price contract award will be made in writing to the lowest responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts may only be used to determine the low bid when prior experience indicates that such discounts are usually taken; and
- e. The Board reserves the right to reject any or all bids for sound documented reason.

2. Proposals

Procurement by proposals is a method in which either a fixed price or cost-reimbursement type contract is awarded. Proposals are generally used when conditions are not appropriate for the use of sealed bids or in the case of a recognized exception to the sealed bid method.

If this method is used, the following requirements apply:

- a. Requests for proposals shall be publicized and identify all evaluation factors and their relative importance. Any response to the publicized requests for proposals shall be considered to the maximum extent practical;

- b. Proposals shall be solicited from an adequate number of sources;
- c. The College shall use its written method for conducting technical evaluations of the proposals received and for selecting recipients; and
- d. Contracts shall be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

The College may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services through A/E firms are a potential source to perform the proposed effort.

3. **Noncompetitive Procurement Proposals**

Procurement by noncompetitive proposals allows for solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- a. Micro-Purchases;
- b. The item is available only from a single source;
- c. The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation;
- d. The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the College; or
- e. After solicitation of a number of sources, competition is determined to be inadequate.

Domestic Preference for Procurement

As appropriate and to the extent consistent with law, the College shall, to the extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. Such requirements shall be included in all subawards including all contracts and purchase orders for work or products under the Federal award.

Contract/Price Analysis

The College shall perform a cost or price analysis in connection with every procurement action in excess of \$250,000, including contract modifications. A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, the College shall come to an independent estimate prior to receiving bids or proposals.

When performing a cost analysis, the College shall negotiate profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

Time and Materials Contracts

The College uses a time and materials type contract only (1) after a determination that no other contract is suitable, and (2) if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and materials type contract means a

contract whose cost to the College is the sum of the actual costs of materials, and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, the College sets a ceiling price for each contract that the contractor exceeds at its own risk. Further, the College shall assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

Suspension and Debarment

The College will award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed procurement. All purchasing decisions shall be made in the best interests of the College and shall seek to obtain the maximum value for each dollar expended. When making a purchasing decision, the College shall consider such factors as (1) contractor integrity; (2) compliance with public policy; (3) record of past performance; and (4) financial and technical resources.

The President shall have the authority to suspend or debar a person/corporation, for cause, from consideration or award of further contracts. The College is subject to and shall abide by the nonprocurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 C.F.R. Part 180.

Suspension is an action taken by the College that immediately prohibits a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 C.F.R. chapter 1) for a temporary period, pending completion of an agency investigation and any judicial or administrative proceedings that may ensue. A person so excluded is suspended. (2 C.F.R. Part 180 Subpart G)

Debarment is an action taken by the President to exclude a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 C.F.R. chapter 1). A person so excluded is debarred. (2 C.F.R. Part 180 Subpart H)

The College shall not subcontract with or award subgrants to any person or company who is debarred or suspended. For contracts over \$25,000, the College shall confirm that the vendor is not debarred or suspended by either checking the Federal government's System for Award Management, which maintains a list of such debarred or suspended vendors at www.sam.gov; collecting a certification from the vendor; or adding a clause or condition to the covered transaction with that vendor. (2 C.F.R. Part 180 Subpart C)

Maintenance of Procurement Records

The College shall maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price (including a cost or price analysis).

Reporting Methodology

TCC will prepare and submit to DEO reports summarizing the Subrecipient's activities and program status, in accordance with the reporting requirements of this Agreement, Program Guidelines, and applicable DEO policies. TCC will submit monthly reports to the DEO Grant Manager by the tenth (10th) calendar day of each month. TCC will submit additional reports upon request.

Federal Funding Accountability and Transparency Act (FFATA): The Subrecipient shall comply with the requirements of 2 CFR part 25 Universal Identifier and System for Award Management (SAM). The Subrecipient must have an active registration in SAM in accordance with 2 CFR part 25, appendix A, and must have a Data Universal Numbering System (DUNS) number. The Subrecipient must also comply with provisions of the Federal Funding Accountability and Transparency Act, which includes requirements on executive compensation, 2 CFR part 170 Reporting Subaward and Executive Compensation Information.

A Contract and Subcontract Activity form, Form HUD-2516, currently available at https://www.hud.gov/sites/documents/DOC_36660; which is incorporated herein by reference, must be submitted by April 15 and October 15 each year through the DEO's SERA reporting system. The form must reflect all contractual activity for the period, including Minority Business Enterprise and Woman Business Enterprise participation. If no activity has taken place during the reporting period, the form must indicate "no activity".

The Section 3 Summary Report, form HUD-60002, must be completed and submitted through DEO's SERA reporting system by July 31, annually. The form must be used to report annual accomplishments regarding employment and other economic opportunities provided to persons and businesses that meet Section 3 requirements.

For the audit requirements addressed in Part II, paragraph 1, the Subrecipient shall ensure that the audit complies with the requirements of section 215.97(8), F.S. This includes submission of a financial reporting package as defined by section 215.97(2), F.S., and Chapters 10.550 (local governmental entities) and 10.650 (nonprofit and for-profit organizations), Rules of the Auditor General.

Copies of reporting packages for audits conducted in accordance with 2 CFR 200, Subpart F - Audit Requirements, and required by Part I of this form shall be submitted, when required by 2 CFR §200.512, by or on behalf of the Subrecipient directly to the Federal Audit Clearinghouse (FAC) as provided in 2 CFR §200.36 and §200.512.

The FAC's website provides a data entry system and required forms for submitting the single audit reporting package. Updates to the location of the FAC and data entry system may be found at the OMB website.

2. Copies of financial reporting packages required by Part II of this form shall be submitted by or on behalf of the Subrecipient directly to each of the following:

a. DEO at each of the following addresses: Electronic copies (preferred): or Paper (hard copy):
Audit@deo.myflorida.com Department Economic Opportunity MSC # 130, Caldwell Building 107 East
Madison Street Tallahassee, FL 32399-4126

b. The Auditor General's Office at the following address: Auditor General Local Government Audits/342
Claude Pepper Building, Room 401 111 West Madison Street Tallahassee, Florida 32399-

The Auditor General's website (<https://flauditor.gov/>) provides instructions for filing an electronic copy of a financial reporting package.

3. Copies of reports or the management letter required by Part III of this form shall be submitted by or on behalf of the Subrecipient directly to:

Electronic copies (preferred): Audit@deo.myflorida.com

or Paper (hard copy):

Department Economic Opportunity
MSC # 130, Caldwell Building
107 East Madison Street
Tallahassee, FL. 32399-4126

4. Any reports, management letters, or other information required to be submitted DEO pursuant to this Agreement shall be submitted timely in accordance with 2 CFR §200.512, section 215.97, F.S., and Chapters 10.550 (local governmental entities) and 10.650 (nonprofit and for-profit organizations), Rules of the Auditor General, as applicable.

5. Subrecipients, when submitting financial reporting packages to DEO for audits done in accordance with 2 CFR 200, Subpart F - Audit Requirements, or Chapters 10.550 (local governmental entities) and 10.650 (nonprofit and for-profit organizations), Rules of the Auditor General, should indicate the date that the reporting package was delivered to the Subrecipient in correspondence accompanying the reporting package.

PART V: RECORD RETENTION. The Subrecipient shall retain sufficient records demonstrating its compliance with the terms of this Agreement for a period of five (5) years from the date the audit report is issued, or six (6) state fiscal years after all reporting requirements are satisfied and final payments have been received, whichever period is longer, and shall allow DEO, or its designee, CFO, or Auditor General access to such records upon request. The Subrecipient shall ensure that audit working papers are made available to DEO, or its designee, CFO, or Auditor General upon request for a period of six (6) years from the date the audit report is issued, unless extended in writing by DEO. In addition, if any litigation, claim, negotiation, audit, or other action involving the records has been started prior to the expiration of the controlling period as identified above, the records shall be retained until completion of the action and resolution of all issues which arise from it, or until the end of the controlling period as identified above, whichever is longer.

Complaints and Grievances

Complaints and Grievances Policy

[TCC] Community Development Block Grant Disaster Recovery (CDBG-DR) Workforce Recovery Training Grant will adhere to the requirements stipulated below:

Complaints or grievances may be filed regarding any and all concerns that participants or participant applicants may have with the procedures followed and services provided by the WRTP. We encourage participants to first contact the Program Director to discuss and provide opportunity to resolve any complaints or grievances. Complaints of Title IX Sexual Harassment should be filed promptly and directly with the College's Equity Officer/Title IX Coordinator at (850) 201-6074, or Rena.Tolson@tcc.fl.edu, or postmark to

Tallahassee Community College
Attn: Rena Tolsen, Equity Officer & Title IX Coordinator
Room 239 Administration Building
444 Appleyard Drive
Tallahassee, FL 32304-2895

Complaints or grievances relating to actions or decisions made by DEO may be filed with DEO. Any complaint or grievance filed with an inappropriate entity will be forwarded to the proper entity for action.

Complaints or grievances may be filed with DEO in the following ways:

- Via online complaint form available on the Rebuild Florida website at <http://www.rebuildflorida.gov>. Workforce Recovery Training Program Guidelines v1.5 effective 05-08-20 27
- Via U.S. mail to: Attention: Rebuild Florida Constituent Services Division of Community Development Florida Department of Economic Opportunity 107 East Madison Street Caldwell Building, MSC 160 Tallahassee, FL 32399
- Via email to: cdbgdr@deo.myflorida.com .

All complaints and grievances will be addressed and responded to in writing within 15 working days.

Appeals

Appeals may be filed only upon the deliverance of an adverse program decision regarding eligibility, benefits, or closure of an application, and only within the parameters set by the appeals procedure. Participants may not appeal program policy. If an individual is denied program services or benefits and desires to appeal, the individual should first file the appeal with TCC WRTP staff that made the initial eligibility decision.

Appeal procedure:

1. All appeal letters must be submitted in writing within 30 days of the date of the denial letter via:
 - a. Email: Grants@tcc.fl.edu
 - b. U.S. mail to:
Tallahassee Community College
Attn: Sponsored Programs
444 Appleyard Drive
Tallahassee, FL 32304-2895

2. All appeal letters must include:
 - a. Reason for appeal;
 - b. A clear explanation why the denial was contrary to applicable laws or regulations or in some other way inequitable;
 - c. Reason why individual is believed to be eligible for the service or benefit that was denied, delayed, reduced, modified, or terminated;
 - d. Proposed remedy sought by the individual;
 - e. Name, contact address, and contact telephone number of individual filing appeal; and
 - f. Signature and date.

Appeals will be handled by the TCC WRTP appeals committee comprised of [TCC] WRTP staff, representing Student Affairs, Provost/Academic Programs, and Administrative Services to hear and review the candidate's case. The committee's primary function is investigative; the committee makes no decision in the case of candidate petitions, but serves the sole purpose of recommending to the Program Director various actions and conclusions including a candidate's appeal for readmission. Recommendations and determinations will be documented, filed and communicated in writing with all parties.

If, after following the TCC appeal procedure, an individual wishes to appeal the final determination by the TCC WRTP staff to DEO, an appeal may be filed with DEO as follows:

1. All appeal letters must be submitted in writing within 30 days of the date of the denial letter via:
 - a. U.S. mail to: Office of Disaster Recovery, Special Deputy of Appeals Division of Community Development Florida Department of Economic Opportunity
107 East Madison Street Caldwell Building,
MSC 160 Tallahassee, FL 32399
Email to CDBG-DR@deo.myflorida.com

2. All appeal letters must include:
 - a. Reason for appeal;
 - b. A clear explanation why the denial was contrary to applicable laws or regulations or in some other way inequitable;
 - c. Reason why individual is believed to be eligible for the service or benefit that was denied, delayed, reduced, modified, or terminated;
 - d. Proposed remedy sought by the individual; o
 - e. Name, contact address, and contact telephone number of individual filing appeal; and
 - f. Signature and date. Workforce Recovery Training Program Guidelines v1.5 effective 05-08-20 28

An appeal initiated by a participant or participant applicant with DEO will follow written appeal procedures, which may include, but may not be limited to, informal hearings, third-party review or administrative review. Individuals may contact DEO for more information on the appeal procedure.

Monitoring and Compliance

Monitoring and Compliance

As a recipient of federal funds, TCC ensures the capacity and means to deliver WRTP services and that the costs of its activities are eligible, reasonable, and necessary in accordance with Workforce Recovery Training Program Guidelines.

The sub recipient has internal controls in place to provide reasonable assurance that the grant operations will achieve the following objectives:

- Effectiveness and efficiency of operations
- Reliability of reporting for internal and external use
- Compliance with applicable laws and regulations
- Deliver services and meet performance metrics for implementation

TCC will be subject to routine monitoring and compliance review by DEO or its representatives based on an initial risk analysis.

TCC will ensure compliance in the following:

Organization, procurements, policies and procedures, duplication of benefits, necessary and reasonable cost standards, financial management, file management and documentation, national objective, eligibility of funding, reporting, and compliance with these guidelines, the subrecipient agreement, and any applicable laws and regulations, verification of official documents against state records, review of application materials and expense documentation.

Monitoring reviews may be announced or unannounced. Monitoring may take place on site or remotely. Reviewed documentation may be randomly selected. Participant applications and documentation must be maintained and made available by subrecipients. All monitoring results will be recorded in detail for compliance, use of funds, etc. Issues of non-compliance may be categorized as either findings or observations. Subrecipients found to be in non-compliance, or which received funds in error, may be required to repay grant funds to the State of Florida, in accordance with the subrecipient agreement.

TCC WRTP has monitoring policies and procedures in place to ensure regulations 2 CFR 200.327-328 are being followed.

Monitoring policies and procedures provide guidance on conducting, documenting, and reporting on monitoring activities and on follow up areas of non-compliance. Monitoring best practices include:

- Prioritizing based on risk;
- Prescribing a sampling methodology;
- Monitoring performance;
- Implementing a tracking system; and
- Technical assistance procedures.

The monitoring policies and procedures should include monitoring project/program performance. Best practices include monitoring based on:

- Compliance with approved application scope, funding specifications, and other requirements;
- Program guidelines;
- Contract/agreement requirements;
- Implementation schedule and milestones. [2 CFR 200.328]

TCC Internal Monitoring and Compliance Plan:

The TCC WRTP Internal Team will meet monthly to ensure proper monitoring of:

1. **Service Design and Delivery:** Planning and Program Design, Implementation, Products and Deliverables, Business Services and Employer Engagement, Participant Services
2. **Grant Operations:** Project Management, Budget, Property Management, Procurement and Contract administration, Performance Management, Subrecipient Management and oversight, Records Management, Personnel, Civil Right, Complaints, Grievances and Incident Reports
3. **Financial Management:** Internal Controls, Accounting system and financial reporting, payment and cash management, Match and Leveraged Resources, Program Income, Allowable Costs and Cost Classification, Cost Allocation/Indirect Costs, Audits and Audit Resolution.

Monthly programmatic and fiscal monitoring reviews will be conducted to track subrecipient and partner organization's Fiscal and Programmatic activities. MOU's will be reviewed to ensure partner/organization is operating within the Scope of Work defined in the Agreement, meeting the requirements of the MOU and operating within budget. All or select elements defined in the MOU are subject to review. Elements tracked are recorded. Areas of review include but are not limited to: Training services, registrations and class schedule, career services and documentation, Case files, Case management, Supportive services and documentation, staff qualifications, participant progress reports, attendance records, certifications and other evidence validating performance measures and outcomes, proof of training completion and certifications earned and post graduate employment information.

Surveys are conducted to solicit Participant feedback one month into programming utilizing online survey development cloud-based software as a means to monitor program delivery and to aid in detecting areas of non-compliance. Each cohort feedback will assist in determining areas of corrective action and subsequent cohorts will serve as follow up monitoring to verify the corrective actions have taken place. Feedback may also be solicited to select individuals who were not accepted, who have exited the program, both with and without employment. Participant feedback provided will be retained and any necessary reporting to DEO will take place as required by the agreement.

Monitoring reports are issued and contain corrective action plans with a timely resolution process for concerns, observations, issues or findings. Reports are communicated electronically to the appropriate parties and TCC WRTP leadership. Follow up monitoring is conducted. Monitoring visits may occur announced or unannounced. All reporting documentation and follow up documentation will be retained and any necessary reporting to DEO will take place as required by the agreement.

Quality Assurance and Quality Improvement

The grant recipient has internal controls in place to provide assurance that that grant operations are performing at the highest quality and that those operations are being maintained and continuously improved.

The **purpose** of the Quality Assurance/Quality Control (QA/QC) procedures is meet performance measures, rules and requirements identified by the federal government and by the sub recipient's contractual agreement with the DEO.

The procedures have been created to achieve the following **goals**:

- Implement continuous process improvement
- Utilize data collected during the monitoring process to focus QA/QC efforts
- Perform desk reviews in a timely manner
- Perform efficient on-site reviews for areas that reveal the most risk from the monitoring reviews
- Perform single audit reviews in a timely manner
- Eliminate non-value-added activities within the DR Program

In addition to periodic internal monitoring, sub recipient will conduct surveys by participants, internal staff, external partnerships, contractors, and stakeholders to gather data and documentation of administration delivery and outcomes with the goal of identifying strengths and weaknesses within the program.

Quality assurance reports may indicate a need to make periodic adjustments and possible amendments to program delivery as a result. Sub recipient will abide by all requirements related to programmatic or fiscal changes required by the CDBG WFRT Program.

The **objectives** are as follows:

- Determine Subrecipient and partners/contractors are adhering to the terms of their agreement with the Disaster Recovery Grantee.
- Assure costs/draws submitted by Subrecipients are eligible based on applicable laws and CDBG regulations.
- Determine if the Subrecipients have adequate programmatic and financial controls.
- Continuously assess the capacity Subrecipients over the life of the program.
- Continuously identify areas of opportunity and provide technical assistance where needed to Subrecipients.
- Monitor, evaluate and recommend improvements for all DR program processes.
- Comply with federal monitoring requirements of 24 CFR 570.501(b) and with 24 CFR 84.51 and 85.40.
- Ensure records are maintained throughout the life of the program and after.
- Issue findings and concerns where applicable based on agreed upon attributes.
- Follow-up with any compliance issue, assure corrective actions and controls are in place, and provide technical support to internal team and Partners/Contractors.

Financial Management

TCC WRTP has financial management policies and procedures in place to ensure compliance with regulations 24 CFR 570.502 and 2 CFR 200.302 and can be found in TCC Board approved policies and Procedures **6000-po6110** Finance Grants and Contracts Office Post Award – Pre - Uniform Guidance Federal Grants Management Manual

TCC financial management policies and procedures define staff qualifications and duties, lines of authority and segregation of duties. The goal is to reduce opportunity for someone to perpetrate or conceal errors or irregularities in the normal course of duties. [2 CFR 200.303]

The financial management policies and procedures include processes for the following:

- Control and secure access to assets, blank forms and confidential documents;
- Approve and record transactions;
- Periodic comparison of financial records to actual assets and liabilities; and
- Support accounting record entries with documentation (receipts, invoices, canceled checks, etc.).

TCC financial management policies and procedures clearly define that all required HUD CDBG activities are shown to have reasonableness, allowability, and allocability of costs incurred and are captured within its reports in compliance with [2 CFR 200.302].

TCC's financial management policies and procedures include the process to ensure that financial statements and reporting are complete, current, reviewed periodically and provide complete disclosure of the financial results of each Federally-sponsored project or program. [2 CFR 200.302]

The financial management policies should include how HUD CDBG-DR activities are captured within the TCC reports including:

- Amount budgeted;
- Advances/reimbursements received to date;
- Program income & other miscellaneous receipts;
- Actual expenditure/disbursements;
- Current encumbrances/obligations; and
- Unpaid request for payments.

The process to accurately project the cash needs of the organization is included in the financial management and monitoring Plan in accord with 2 CFR 200.305.

TCC financial management policies and procedures include information on how audits are conducted and in accordance with applicable standards. A systematic method should be utilized to assure timely and appropriate resolution of audit findings and recommendations. [2 CFR 200.501-507]

TCC addresses the requirement for Single Audits, including when and how they are conducted. [2 CFR 200.501]

Detection and Prevention of Fraud, Waste and Abuse

HUD requires policies to prevent fraud, waste, and abuse. DEO is committed to aggressively detecting and eradicating fraud, waste, and abuse to ensure that DEO-administered programs provide services to customers effectively and efficiently and that taxpayer funds are protected.

TCC WRTP's monitoring policy and procedure in place and agreements with partners and subcontractors will ensure the appropriate use of CDBG funds to verify each employee, customer, and partner roles and responsibilities ensure that service delivery is in compliance with local, state, Workforce Recovery Training Program Guidelines v1.5 effective 05-08-20 11 and federal laws and policies, and that any incidents are reported immediately for investigation and resolution.

In addition, DEO has established procedures for verifying the accuracy of information provided by subrecipients and participants. The program will investigate all allegations regarding eligibility, disbursement of funds, or any other allegations of fraud or noncompliance. Where appropriate, the program will assist federal, state, and local agencies in investigations.

To file a complaint to TCC, send detailed information about the Fraud, Waste or Abuse allegation in writing to the Vice President for Administrative Services and Chief Business Officer in accordance with Policy po8900: Anti-Fraud:

Tallahassee Community College

Attn: VP Barbara Wills

Address: 444 Appleyard Drive

Tallahassee, FL 32304-2895

Include the following information with your complaint:

- ❑ Who committed the alleged violation?
- ❑ What violation are you alleging? Describe in detail what the subject did that was improper. Please indicate when this occurred, where it occurred, how it occurred, and identify any other witnesses who have information about the alleged violation. Please identify any evidence you have that is relevant to the alleged violation
- ❑ Have you notified anyone else or any other agency of the allegation(s)
- ❑ If yes, to whom and what were the results?

You may remain anonymous if you choose. However, it is most beneficial if we have the ability to contact you for additional information and/or clarification of the issues you are reporting.

All complaints are reviewed by the investigative staff and either answered with existing information, investigated, or referred to management, another agency or law enforcement.

Additionally, any complaints or allegations of fraud, waste, abuse, or noncompliance reported to TCC involving WRTP participants or funds will be reported to the DEO Office of Inspector General within 10 business days of receipt of formal written complaint.

Instances of suspected fraud, waste, and abuse should be reported to the DEO Office of Inspector General and to the HUD OIG Fraud Hotline at:

☐ Office of Inspector General

Florida Department of Economic Opportunity
107 East Madison Street Caldwell Building, MSC 300
Tallahassee, FL 32399-4126
(850) 245-7135

OIG@deo.myflorida.com

Online complaint form: <http://www.floridajobs.org/office-directory/office-of-the-inspectorgeneral/request-for-assistance/general-complaint-form>

☐ HUD Inspector General Hotline (GFI)

451 7th Street,
SW Washington, DC 20410
1-800-347-3735

hotline@hudoig.gov

More information and online complaint form: www.hudoig.gov/report-fraud

Contracts Administration Plan

TCC WRTP has a formal contract administration plan in place to ensure that regulations 2 CFR 200.317-326 are being followed.

The contract administration plan includes these best practices:

- ☐ Utilizing contract templates for developing contract.
- ☐ Identifying a contract administrator for each contract executed.
- ☐ Implementing a process to ensure contractor abides by the terms of the contract procedures.
- ☐ Implementing a deliverable review/approval process.
- ☐ Implementing a process for managing issues that may arise with the contractor.

TCC WRTP partner/contractors will be subject to routine monitoring and compliance review by WRTP staff or its representatives based on an initial risk analysis.

Subrecipient Internal monitoring Schedule:

Monthly monitoring review tracking sub recipient partners/contractor Programmatic activities, Training services, registrations and class schedule, career services and documentation, Supportive services and documentation, progress reports, certifications and other evidence validating performance measures and outcomes, proof of training completion and certifications earned and post graduate employment information. Documentation in writing is provided to ensure program adjustments are made. Follow up monitoring is completed and documented.

Recordkeeping Plan

TCC WRTP has recordkeeping policies and procedures in place to ensure compliance with regulations 24 CFR 570.506, 24 CFR 570.490 and 2 CFR 300.333-337.

Recordkeeping policies and procedures describe the information in the following manner:

- The information that needs to be collected can include but is not limited to stakeholders such as partners, employees and participants demographics, directory information, qualifications and accomplishments, Organizational chart, Grant agreement or State Plan, Approved budgets for programs/grants being reviewed, Financial reports and accrual tracking worksheets, Cash management, draw reports, reconciliations and procedures, Cost allocation methodologies to include either a negotiated indirect cost agreement and/or approved cost allocation plan (If applicable), Property (real and personal) management - policy and inventory list, roles and responsibilities, MOU's, Current leases and contracts, Partner Organization financial and performance reports, public and private information, Audits & audit resolution at partner organization level, Monitoring reports, schedules & review instrument, application information including Participant files, policy and management, income documentation, Recent complaints and grievances - policy and appeal process, Civil Rights and EEO Policies, forms and appeal process, consents and releases, Code of conduct and conflict of interest policy and forms, Records - retention, custody, schedule security, and transfer policies, Recently filed incident reports and policy, disclosures, DOB, proof of Work Authorization, etc.
- The information should be collected and used to discover stakeholder qualifications to determine eligibility to perform or receive services within the WRTP.
- The information will be collected prior to the start of performing or receiving services and periodically thereafter to ensure eligibility to perform or receive services in the WRTP continues.
- All stakeholders must submit any changes in circumstance as soon as possible in writing to WRTP Project Director (within two weeks of the change at the latest). Project Director will report to DEO as required in the agreement. Monitoring Schedules are developed based on risk for various stakeholders. The frequency for partner organizations generally is monthly during monitoring reviews. The participant information is collected once at enrollment and verified during programming. Participant follow up information related to career placement is collected once within 60 days after exit of the WRTP.

The following TCC WRTP recordkeeping policies and procedures detail how the information should be acquired, organized and retained (in an orderly manner that provides ease of examination by any applicable parties and stored in a secure, central location). TCC is committed to protecting its students, employees, and partners from illegal or damaging actions by individuals, either knowingly or unknowingly.

Confidential Information

This information is sensitive in nature to either the institution or individuals. Access to this information must be tightly restricted based on "need to know." Additionally, all information protected by Federal or State laws or regulations (referred to throughout this document as

"protected information") shall be treated as confidential. Examples include personal information that cannot be found in the public domain (e.g., Social Security Numbers, account numbers, date of birth, student grades, etc.), account information (e.g., account balances, payments, etc.), vendor information, and other sensitive information integral to the success of the college. Employees must exercise good judgment in properly handling confidential information.

- The information will be acquired by the responsible party. WRTP Staff identified on the project are verified by the entity responsible in the Organizational Chart. Partner Organizations may be scrutinized utilizing requested most recent audits. Additionally, partner staff are subject to sampling during the monthly monitoring.
- All information collected will be organized and maintained electronically on secured networks within the WRTP service locations identified in the grant. All staff authorized to have access must abide by TCC policies and procedures.

Unless authorized by the TCC Associate Vice President of Institutional Technology, users may not use workstations to:

- Store confidential data, including documents referencing confidential information. This data should be stored on secured network shared drives.
 - Install or uninstall software or hardware unless required for completion of job tasks.
 - Reconfigure the system settings, which include hardware and software modification using the control panel unless required for completion of job tasks.
 - Copy or move confidential data to external media (i.e, floppy disk, writable CD, flash drives, etc).
 - Download files from the Internet unless required for completion of job tasks.
 - Allow others to use the workstation without logging off.
-
- The information will be locked when leaving workstations and will be password protected. Any physical files must be stored securely, locked and secured onsite.
 - The use of the Responsible Organization's laptops, notebooks, or other portable computers must comply with all the workstation policies above. When not in use, portable computers must be stored securely. If taken offsite, portable computers should either be in direct control of an authorized employee or physically secured with a locking mechanism accessible only to authorized employees.

The following details how the subrecipient will provide access to records and/or personnel by authorized agencies and/or citizens.

- Employees must exercise utmost caution when sending any email from inside TCC to an outside network, including authorized agencies and/or citizens, to prevent accidental disclosure of sensitive information. The requirements must be followed when emailing within and from the TCC] network:
 - Auto forwarding of College email is prohibited (e.g., Gmail, Yahoo etc).
 - Confidential data, as defined above, may not be forwarded via any means. If confidential information has been received through an email, and it must be sent to a new recipient, a new email message will be composed. Only the pertinent information will be copied to the new email.

- Any user needing to send confidential information via email must secure approval of their administrator and must contact Institutional Technology to ensure appropriate encryption is used.

The following recordkeeping policies and procedures describe the required retention period including that specified in the Subrecipient Agreement.

- The retention period for all records acquired for the WRTP is 6 years from the end of the grant (September 1, 2023 grant end date).

Income Verification Plan

TCC CDBG_DR Workforce Recovery Training Program has income verification processes in place to ensure that all required HUD CDBG-DR and program requirements are followed. The collection of Rebuild Florida WRTP participant application with all supporting data and documentation for all sources of income will be collected and verified for accuracy and completeness by both CDBG-DR staff and partners/contractors. Final eligibility determination and approval for participant enrollment will be made by the Program Director prior to receiving services. TCC WRTP will assist the applicants in entering complete applications and documentation into the program portal and will be responsible for maintaining the official copy of record for each participant by downloading and ingesting application data and attachments into the TCC WRTP data storage system, and updating the system with documentation of progress and outcomes for the duration of the records retention requirement for the WRTP.

1. Income information submitted with each application will be verified through the collection and analysis of the following forms of documentation for all adult household members (18+). Upon receipt of required documentation for income status, TCC WRTP will verify information with current employer or agency providing financial support, and if required the IRS. In some cases TCC WRTP may use a third-party verification service to get the information directly. If any required document is insufficiently completed or missing in its entirety, TCC WRTP will attempt to correct the application by contacting the applicant directly. Failure to correct the application will result in immediate removal of the applicant's application. All of the following applicable documentation will be required prior to final consideration:
 - Most recent tax returns (IRS 1040, 1040A or 1040EZ) signed and submitted; OR
 - Documentation of Income:
 - Salary/Wage/Tips/Commissions, etc.: Last 3 months of pay stubs OR signed statement from employer stating wage and frequency of payment.
 - Self-employment Income: IRS 1099, profit/loss statement, or ledger.
 - Interest, Dividends: IRS 1099 DIV or account/holding statements.
 - Benefits: Social security or disability, retirement, survivor, SSA, TANF, Veterans', alimony, pension or annuity current letter of benefits (should include benefit amount).
 - SSA: Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs; Workforce Recovery Training Program Guidelines v1.5 effective 05-08-20 26
 - Retirement
 - Unemployment Income: current letter of benefits or printouts (should include benefit amount).

- Workers Compensation Income: letter of benefits from insurance company or court (should include benefit amount).
 - Documentation of any other sources of income received regularly.
2. Additional Income information identified will be verified with accompanying documents from the sources of income.
 3. Self-Certified income information must utilize the Income Self-Attestation Form and Zero Self-Attestation Form.
 4. Applicant's income status (LMI status) at the time of application processing, as determined by household income and size in accordance with published HUD income limits, will be determined and documented.

This plan is in compliance with the definition of income utilized by the WRTP. *Annual income as reported under the Census long-form for the most recent available decennial Census.*