



GRANT MONITORING: KEEP CALM, YOU'VE GOT THIS! PEER-TO-PEER CALL

APRIL 20TH 2:00 – 3:00 PM (EASTERN)



AGENDA



- Welcome & Introductions
- Establish Effective Peer Sharing Strategies
- Monitoring Process & Common Findings
- Questions
- Recap and What's Ahead



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PRESENTERS



WHAT MAKES AN EFFECTIVE VIRTUAL CONVERSATION?



ENGAGE EVERYONE



BE HEARD AND SEEN



ACKNOWLEDGE SPEAKER



MAXIMIZE MICROPHONES



MINIMIZE NOISE



MAXIMIZE VISUAL DISPLAYS

POLL #1

What is your monitoring visit timeline?

- We have completed our monitoring visit.
- Our monitoring visit is scheduled and happening soon.
- We have not yet been scheduled for a monitoring visit.





MONITORING PROCESS

PURPOSE OF MONITORING

- Measure grant progress
- Identify areas of compliance and non-compliance
- Provide targeted technical assistance
- Ensure that federal funds are used responsibly

MONITORING OVERVIEW

- Monitoring is conducted by the Federal Project Officer (FPO)
- Some reviews are conducted jointly with ETA Division of Financial Management and Administrative Services (DFMAS):
 - FPO reviews project implementation
 - DFMAS accountant conducts financial management review
- Reviews are conducted on-site or remotely via Enhanced Desk Monitoring Reviews (EDMR)
- ETA monitors grants at least once during the period of performance
 - Mid-point of grants' period of performance
 - Reviews last 3-5 days

SCHEDULING MONITORING

- FPO works with the grantee to schedule a review
- 1-2 months before monitoring grantee's Authorized Representative receives:
 - A formal review notification/scheduling letter
 - Copy of the Core Monitoring Guide
 - Documentation request (formats vary by Region)

FPO'S PRE-MONITORING REVIEW AND PREPARATION

- FPO reviews grant documents:
 - Grant agreement – Statement of Work, Budget, etc.
 - Grant amendments (aka modifications)
 - Funding Opportunity Announcement (FOA)
 - Quarterly performance and financial reports
 - Documentation provided by the grantee prior to the monitoring
- FPO develops a monitoring plan and agenda

MONITORING PROCESS

- Entrance Conference
 - Discuss the purpose of monitoring, finalize the agenda, confirm logistics, describe the monitoring process and the timeline for the report
- ETA Reviewer:
 - Interviews grantee staff
 - Provides technical assistance as needed
 - Identifies findings, areas of concern or positive practices
 - Discuss any perceived critical issues identified during the pre-monitoring document review
 - Collects supporting evidence for findings
- Exit Conference
 - Concludes the review
 - Provides a summary of issues or positive practices

POST-MONITORING PROCESS

- FPO completes documentation review
 - Additional findings/issues may be identified
- Monitoring Report
 - Issued within 45 days after the Exit Conference
 - Provides background information about the monitoring and grant progress
 - Includes detailed descriptions of compliance findings, applicable federal/grant requirements and required corrective actions

RESOLUTION OF FINDINGS

- Grantee's response is due within 30 days after receipt of the monitoring report
 - Provide documentation required to close findings
 - Develop a Corrective Action Plan (CAP) for findings that cannot be closed within the first 30 days after the monitoring
 - Describe planned corrective actions and provide due dates for findings' resolution
- All findings must be resolved by the end of the grant's performance period to ensure successful closeout of the grant
 - 90% of all findings are expected to be closed within the first year after monitoring



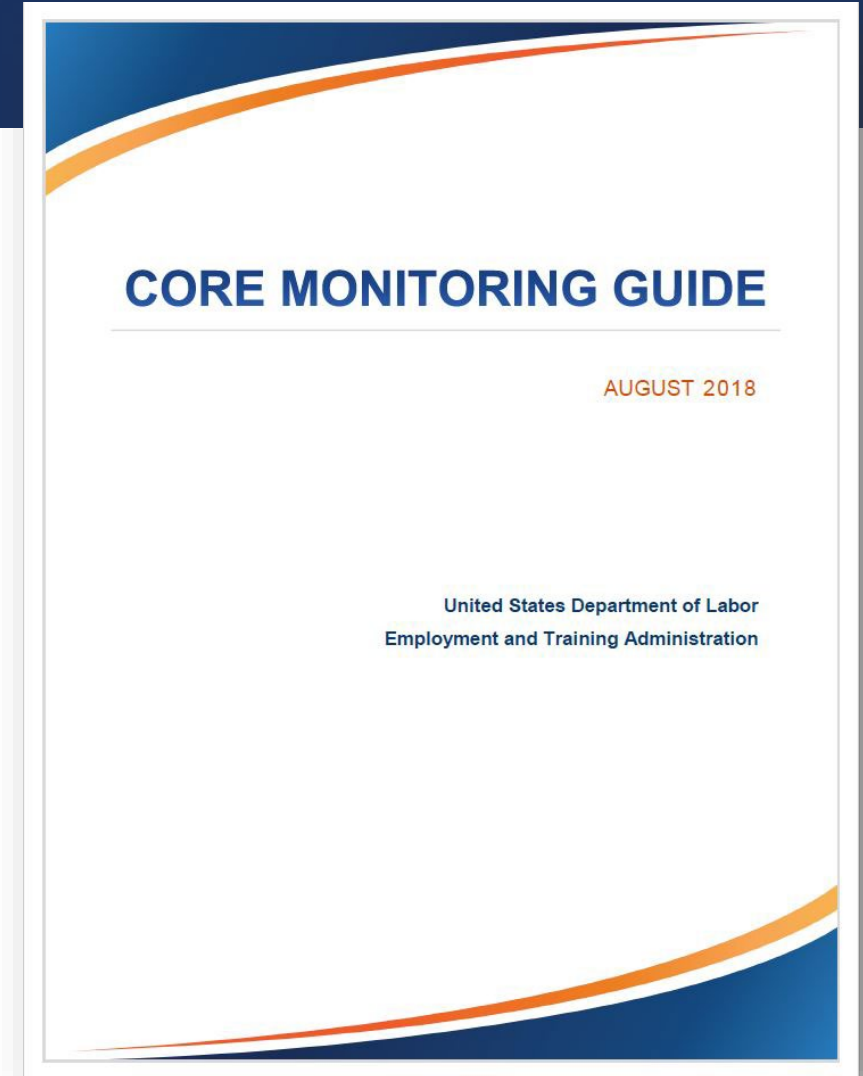
MONITORING OVERVIEW QUESTIONS?



COMMON FINDINGS

CORE MONITORING GUIDE

- ETA's primary review tool
 - Provides a consistent framework for assessing compliance with grant agreement, Federal regulations, and Uniform Guidance
- Core Monitoring Guide (2018)
 - Core Activity 1: Service Design and Delivery
 - Core Activity 2: Grant Operations
 - Core Activity 3: Financial Management
 - Appendix: Resources and Tools



COMMON COMPLIANCE FINDINGS #1

- Lack of policies and procedures related to participant services:
 - Eligibility and enrollment
 - Supportive services
 - Priority of service to veterans and other priority populations
 - Referrals, follow up, placement, etc.
- Lack of policies and procedures related to grant management:
 - Project modifications
 - Grant closeout

COMMON COMPLIANCE FINDINGS #2

- Budget
 - The grantee is not operating within the approved budget
 - Actual vs. planned budget analysis is not performed
 - Actual vs. planned budget analysis is not based on budget form SF-424A
- Performance Management
 - Lack of process to identify, collect, validate, and report required performance data
- Subrecipient Management
 - The grantee did not make a correct subrecipient vs. contractor determination
 - The grantee did not follow the required procurement process
 - Subrecipient monitoring has not been conducted

COMMON COMPLIANCE FINDINGS #3

- Financial reports (ETA-9130)
 - Reports are not submitted on an accrual basis
 - Reports are based on subrecipients' invoices not financial reports
 - Accrued expenditures (grantee's and/or subrecipients') are not tracked
 - Lack of reporting instructions issued to subrecipients
 - Subrecipients' financial reports are not required/submitted
- Cost Sharing or Matching
 - Lack of policies and procedures for match (or leveraged resources) requirements, including identifying, valuating, tracking and reporting
 - Match/leveraged resources are not tracked and reported on ETA-9130

COMMON COMPLIANCE FINDINGS #4

- Cost Allocation
 - Staff is not keeping accurate timesheets, allocating time based on formula and not on actual hours spent on the grant
 - Indirect costs are charged without an approved NICRA
- Procurement and Contract Administration
 - Procurement files are not maintained
 - Procurement is not conducted with full and open competition
 - Contractual agreements do not include all clauses and conditions required by the Uniform Guidance

POLICY AND PROCEDURES CHECKLIST

Likely policy areas for grantee organization

- ☐ Accounting Systems
- ☐ Allowable Costs
- ☐ Audits: Completion, Tracking and Resolution
- ☐ Budget Controls and Modifications
- ☐ Cash Management: Petty Cash, Bank Reconciliations
- ☐ Closeout: Grants and Contracts
- ☐ Compensation and Fringe Benefits
- ☐ Complaints and/or Grievances (participants and staff)
- ☐ Conflict of Interest, including Board members
- ☐ Debt Collection
- ☐ Disaster and Recovery Plan
- ☐ EEO – Resolutions, Appeals, and Hearings
- ☐ Fringe Benefits Package, Vacation and Leave, Pension, Severance Package (if any)
- ☐ Incentives/ Stipends
- ☐ Incident Reporting, Grievances, and Complaints
- ☐ Indirect Costs: NICRA, CAP
- ☐ Meals (staff, Board, participants)
- ☐ Monitoring: Resolution, Appeals and Hearings
- ☐ Participant/Program Services
- ☐ Payroll and Time Distribution
- ☐ Procurement/Purchasing
- ☐ Program Income, Match, and Leveraged Resources
- ☐ Property Management
- ☐ Receivables and Payables
- ☐ Record Retention
- ☐ Reporting: Federal and Subrecipient
- ☐ Salary and Bonus Limits (when applicable)
- ☐ Supportive Services
- ☐ Training (OJL, ITA, Refunds, etc.)
- ☐ Travel
- ☐ Written Code of Conduct



COMMON FINDINGS QUESTIONS?

POLL #2

Based on today's conversation, what next steps will you take? [\(Check All That Apply\)](#)

- I will apply the information and prepare for grant monitoring.
- If in the middle of monitoring, I can better respond/engage with my FPO.
- I still have questions and now feel comfortable reaching out to my FPO.





INCUMBENT WORKERS RECRUITMENT & PLACEMENT

MAY TOPICAL PEER-TO-PEER DISCUSSION



THANK YOU!