



EMPLOYMENT AND TRAINING ADMINISTRATION
UNITED STATES DEPARTMENT OF LABOR

Monitoring Reviews

February 1 at 12:45 p.m. ET

Today's Presenters



Kristen Milstead, Moderator

- *Workforce Analyst, Employment and Training Administration, National Office*



Marium Baker, Presenter

- *Federal Project Officer, Region 5*



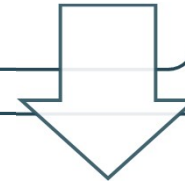
Adrian Barrett, Presenter

- *Federal Project Officer, Region 3*

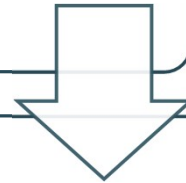


Today's Agenda

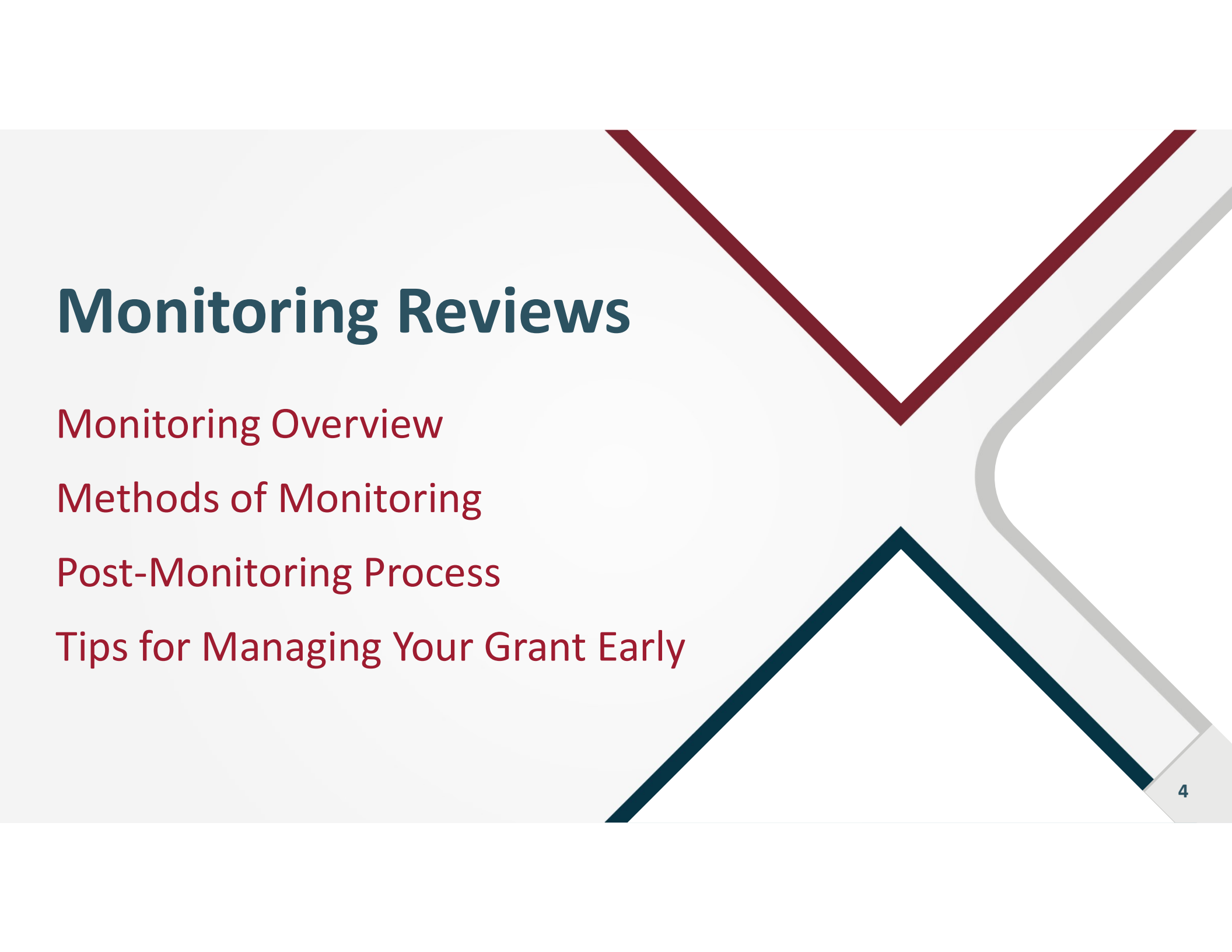
Overview of Monitoring
Reviews



Core Monitoring Guide



Grant Management Resources



Monitoring Reviews

Monitoring Overview

Methods of Monitoring

Post-Monitoring Process

Tips for Managing Your Grant Early



Monitoring Overview

► Purpose of Monitoring

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

► Monitoring Process

- Conducted by FPO and/or fiscal staff (Division of Financial Management and Administrative Services)
- On-site or remotely via Enhanced Desk Monitoring Reviews (EDMR)
- Mid-point of grants period of performance, lasts 3-5 days (sometimes longer)



Monitoring Overview

▶ Scheduling Monitoring-

- ▶ Work with the FPO to schedule the monitoring dates. Ensure grant staff are available during the week of the monitoring.
- ▶ 1-2 months before monitoring grantee receives:
 - ▶ a formal review notification/scheduling letter, copy of the Core Monitoring Guide, Document Request List, Monitoring Agenda
 - ▶ Additional documents may be provided with the scheduling letter



Monitoring Overview

► Tips for preparing for the Monitoring

- Preparation starts at the beginning of the period of performance. Please ensure compliance with the Uniform Administrative Requirements at 2 CFR 200, FOA, other applicable regulations/TEGLs referenced in the Grant Terms and Conditions, establish necessary internal controls, and implement the grant according to the SOW and approved Budget for the achievement of planned performance goals.
- Send all requested documents to the FPO prior to the start of the monitoring. (No PII please)



Monitoring Overview

► Tips for preparing for the Monitoring

- ▶ Ensure that grant documents are organized and easily accessible to grant staff for easy referencing during the review. (Ex. program and financial management policies procedures manuals, tools/forms, participant manuals/materials/folders, performance/financial management tools, MOUs, Contracts, Subrecipient Agreements etc.)
- ▶ Prior to the start of the monitoring, identify challenged areas that you'd like the FPO to provide technical assistance on during the monitoring.
- ▶ Prior to the start of the monitoring, assess if there is an evidenced based promising practice that could be replicated or adapted by other grantees that you'd like to bring to the attention of the FPO during the monitoring.



Monitoring Overview

▶ Role of Grantee during Monitoring

- ▶ Make available grant staff for interviews/discussions (Director, Manager, Coordinator, Outreach staff, Job Placement staff, Case Manager, Employer Engagement staff, Accountant etc.)
- ▶ Be prepared to discuss details regarding internal controls, organizational structure, grant operations, service delivery, tools used in grant implementation, case management system, partnerships, employer engagement, contracts, subaward agreements, MOUs, grant performance etc.
- ▶ If applicable, share challenged areas so that the FPO can identify/provide/facilitate TA.
- ▶ If applicable, be prepared to share evidenced based details regarding possible promising practices.
- ▶ Be open to technical assistance.

Methods of Monitoring

DIFFERENCES

ON-SITE MONITORING REVIEW

ENHANCED DESK MONITORING REVIEW

Structured, limited to 1 week

Flexible, can span several weeks

In-person interviews

Video-/telephone interviews

Review materials electronically and/or on-site

Review materials electronically

Observe activities / services

Focus on documents

SIMILARITIES

Primary Review Tool: 2018 DOL ETA Core Monitoring Guide

Led by the Federal Project Officer; may include DOL accounting staff

Generally takes place once during the period of performance

Interviews of grantee staff, participants, partners

Results in a monitoring report outlining the findings

All findings must be resolved by the end of the period of performance

NOTE

EDMR is the primary method of monitoring during the COVID-19 Pandemic



Post-Monitoring Process

- ▶ Exit Conference
- ▶ Monitoring Report issued within 45 days after Exit Conference
 - Background information about monitoring
 - Detailed descriptions of compliance findings and required corrective actions
- ▶ Grantee's response due within 30 days after receipt of Monitoring Report
 - Provide documentation required to close findings
 - Corrective Action Plan (CAP) and due dates for open findings
- ▶ All findings must be resolved by the end of performance period to ensure successful closeout of the grant
 - 90% of findings expected to be closed within the first year after review



Tips for Successfully Managing Your OW/RH Grant

- ▶ **Communicate with your FPO**
 - ▶ Email and Telephone
- ▶ **Review the Grantee Handbook (June 2020)**
- ▶ **Review the Core Monitoring Guide**
- ▶ **Complete the SMART 3.0 Training Series**
- ▶ **Identify and address issues early**
 - ▶ Recruitment, Financial, and Reporting
- ▶ **Track and Manage progress**
- ▶ **Document successes and challenges**
 - ▶ Don't be afraid to ask for help or technical assistance
- ▶ **Work with your partners**

ETA Grantee Handbook

- ▶ ETA's Team Approach to Grant Management
- ▶ An Overview of Award Documents, Grantee Obligations, and Regulatory Requirements
- ▶ How to Manage Your Period of Performance
- ▶ Modifying Grants
- ▶ Evaluation: What You Need to Know
- ▶ Audit Phase
- ▶ Closeout Phase
- ▶ General Parameters Governing Use of ETA Grant Funds

Effectively Managing ETA
Competitive Grants

Grantee Handbook

U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

Disclaimer – This handbook is a general resource designed to orient grantees to the grant process in ETA. Specific details about particular grants may differ.
This handbook applies to grants awarded on or after July 1, 2016.
Last Update: June 2018

Employment and Training Administration Grantee Handbook



Questions?

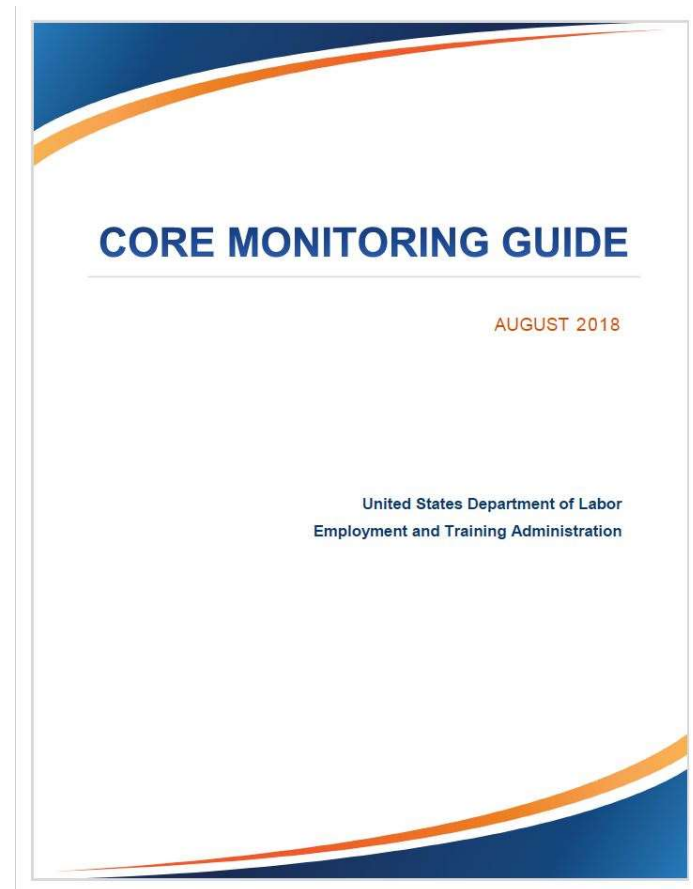
Core Monitoring Guide

Sections of the Core Monitoring Guide
Policy and Procedures Checklist

Core Monitoring Guide

- ▶ Primary review tool
 - ▶ Provides a consistent framework for assessing compliance with grant agreement, Federal regulations, and Uniform Guidance

- ▶ Core Monitoring Guide
 - ▶ Core Activity 1: Service Design and Delivery
 - ▶ Core Activity 2: Grant Operations
 - ▶ Core Activity 3: Financial Management
 - ▶ Appendix: Resources and Tools



CORE ACTIVITY 1: Service Design and Delivery

CORE MONITORING GUIDE

Objective 1.a: Planning and Program Design

- ▶ The grant recipient has conducted all planning activities related to service design and delivery in order to accomplish all grant activities and goals.

Objective 1.b: Implementation

- ▶ The grant recipient has implemented service design and delivery activities in order to accomplish all grant activities and goals.

Objective 1.c: Products and Deliverables

- ▶ The grant recipient has documented and/or developed the products or deliverables outlined in the SOW, PIP, or State Plan or as required in applicable Federal guidance.

Objective 1.d: Business Services and Employer Engagement

- ▶ The grant recipient has documented and performed all service delivery activities outlined in the SOW, PIP, or State Plan related to serving businesses and engaging employer partners to ensure accomplishment of the grant/project goals.

CORE ACTIVITY 1: Service Design and Delivery

CORE MONITORING GUIDE

Objective 1.e: Participant Services

- ▶ The grant recipient is implementing the required service delivery strategy outlined in its award and is providing all required services to participants.

Common Findings

- *Participant service policies are not in place: Eligibility/enrollment, priority of service, assessment, supportive services, training services, placement, follow-up services*
- *Not all participant services stipulated in the SOW are provided*
- *Priority of service to veterans and other priority populations is not provided*

CORE ACTIVITY 2: Grant Operations

CORE MONITORING GUIDE

Objective 2.a: Project Management

- ▶ The grant recipient has an adequate system in place to manage the grant/project, including any specific award conditions, prior approval of project modifications, and closeout requirements.

Common Findings

- ▶ *The grantee does not have a clear understanding of modification process*
- ▶ *There are no written policies and procedures for modifying the grant, grant closeout*

Objective 2.b: Budget

- ▶ The grant recipient has a financial management system or budget control mechanism in place to monitor spending, determine allowability of costs, compare and reconcile the budget to actual expenditures. The system also has triggers for budget modifications when deemed necessary.

Common Findings

- ▶ *Actual vs. planned budget analysis is not performed*
- ▶ *Actual vs. planned budget analysis is not based on budget form SF-424A categories*
- ▶ *The grantee is not operating within approved budget*

CORE ACTIVITY 2: Grant Operations

CORE MONITORING GUIDE

Objective 2.c: Property management

- ▶ The grant recipient maintains a property management system in accordance with all prior approval requirements, terms and conditions of the award, and written programmatic policies and procedures.

Common Findings

- ▶ *Lack of written policies and procedures for purchase and disposition of equipment, supplies, and intangible property developed with grant funds*
- ▶ *Equipment is purchased without prior Grant Officer's approval. (Note: equipment purchases are not allowed for ASE grants)*

CORE ACTIVITY 2: Grant Operations

CORE MONITORING GUIDE

Objective 2.d: Procurement and Contract Administration

- ▶ The grant recipient maintains an adequate procurement/purchasing system that includes written procedures and ensures that all contracting or procurement actions are performed in a manner that provides for full and open competition.

Common Findings

- ▶ *Lack of written policies and procedures for procurement. (Note: State follows the same policies and procedures that it uses for procurement with non-Federal funds.)*
- ▶ *Required contract provisions are not included in the contractual agreements*
- ▶ *Procurement is not conducted with full and open competition*
- ▶ *Cost or price analysis for all procurement actions in excess of Simplified Acquisition Threshold (\$250,000 in 2019) is not performed*

CORE ACTIVITY 2: Grant Operations

CORE MONITORING GUIDE

Objective 2.e: Performance Management

- ▶ The grant recipient maintains a performance management system to manage, track, and measure performance and operating goals, indicators, milestones, and expected outcomes that comply with the terms and conditions of the award.

Common Findings

- ▶ *Lack of process to identify, collect, validate, and report the required performance data.*
- ▶ *Lack of a performance monitoring tool measuring grant progress to ensure that desired outcomes are achieved by the end of the period of performance*

Objective 2.f: Performance Management

- ▶ The grant recipient manages all of its subrecipients and tracks their performance and compliance in meeting the terms and conditions of the subaward.

Common Findings

- ▶ *The grantee does not understand distinctions between subrecipients and contractors*
- ▶ *Pre-award risk assessment of subrecipients has not been conducted*
- ▶ *There not process (tool) to perform subrecipient monitoring and resolve resulting findings. Subrecipient monitoring has not been conducted*
- ▶ *Subrecipients' quarterly performance and financial reports are not required/received*

CORE ACTIVITY 2: Grant Operations

CORE MONITORING GUIDE

Objective 2.g: Records Management

- ▶ The grant recipient maintains a system and implements procedures to manage and secure all financial records, supporting documents, statistical records, and all other records pertinent to the Federal award.

Common Findings

- ▶ *Lack of written policies and procedures for retention of records*
- ▶ *Written policies and procedures for records retention are not in compliance with the Uniform Guidance*
- ▶ *Required accessibility clause granting DOL, the DOL Inspector General, the Comptroller General of US, the Pass-Through Entity (PTE) and any of its authorized representatives access to grant-related records is not included in the policies and procedures*
- ▶ *Measures for protecting the Personally Identifiable Information (PII) are not in place*

Objective 2.h: Personnel

- ▶ The grant recipient's management and staffing are aligned with the SOW, State Plan, or project plan and designed to assure responsible and ethical management of the grant/project.

Common Findings

- ▶ *Salary and bonus limitation requirement is not observed*
- ▶ *Lack of policies and procedures related to personnel/hiring*

CORE ACTIVITY 2: Grant Operations

CORE MONITORING GUIDE

Objective 2.i: Civil Rights, Complaints, Grievances and Incident Reporting

- ▶ The grant recipient has a system in place to ensure the Federal Civil Rights complaints, program complaints, grievances, and incidents are handled properly and in accordance with Federal requirements.

Common Findings

- ▶ *Lack of written discrimination complaint procedures*
- ▶ *Required wording (29 CFR 38.34) stating that the program or activity in question is an “equal opportunity employer/program” and that “auxiliary aids are available upon request to individuals with disabilities” is not included on publications*
- ▶ *The required “Equal Opportunity is the Law” notice (29 CFR 38.35) is not posted in reasonable numbers and places and made a part of grant participants’ files*
- ▶ *The “Equal Opportunity is the Law” notice/poster does not include all non-discrimination bases, and/or does not include other required information, or not the correct one.*
- ▶ *Lack of process and/or policies and procedures for incident reporting – fraud, waste, abuse, mismanagement of funds, etc.*

CORE ACTIVITY 3: Financial Management

CORE MONITORING GUIDE

Objective 3.a: Internal Controls

- ▶ Effective control, integrity, and accountability are maintained for achievement of the grant's objectives in operational effectiveness and efficiency, reliable financial reporting, and compliance with laws, regulations, and policies.

Common Finding

- ▶ *Lack of internal controls in place to prevent unauthorized purchases and disbursements of grant funds; and safeguards of assets, so not one person controls the order, receipt, payment, reconciliation, management, and disposition of an asset.*

Objective 3.b : Accounting System and Financial Reporting

- ▶ An accounting system is in place that allows the grant recipient to maintain accurate and complete disclosure of the grant's financial results and those of its subrecipients.

Common Findings

- ▶ *Lack of written policy to ensure that accounts are reported on an accrual basis*
- ▶ *Accrued expenditures are not tracked*
- ▶ *Quarterly financial reports are not submitted on accrual basis*
- ▶ *Subrecipients' financial reports are not required/submitted*

CORE ACTIVITY 3: Financial Management

CORE MONITORING GUIDE

Objective 3.c: Payment and Cash Management

- ▶ Effective control, integrity, and accountability are maintained for achievement of the grant's objectives in operational effectiveness and efficiency, reliable financial reporting, and compliance with laws, regulations, and policies.

Common Finding

- ▶ *Lack of cash management policies and procedures; improper payments.*

Objective 3.d : Match and Leveraged Resources

- ▶ The grant recipient has written policies and procedures in place to record and support any required match or leveraged resources committed or identified in the award or program regulations.

Common Findings

- ▶ *Lack of written policies and procedures for match (or leveraged resources) requirements, including identifying, valuating, tracking, and reporting.*
- ▶ *There is no system for tracking match (or leveraged resources) contributed to the grant*
- ▶ *Match (or leveraged resources) is not reported on the quarterly ETA-9130 financial reports*
- ▶ *The grantee is not on track to meet the match requirement*

CORE ACTIVITY 3: Financial Management

CORE MONITORING GUIDE

Objective 3.e: Program Income

- ▶ The grant recipient has written policies and procedures in place to accurately record and expend the program income in compliance with applicable Federal statutes, implementing regulations, the terms and conditions of the grant award.

Objective 3.f: Allowable Costs and Cost Classification

- ▶ The grant recipient has a system and procedures in place to ensure that it is incurring necessary, reasonable and allowable costs to the grant and that such costs are accurately classified in its accounting system. The grant recipient also monitors the costs incurred by its contractors and subrecipients to ensure allowability and accurate cost classification.

Common Findings

- ▶ *Lack of written policies and procedures ensuring that the grant is incurring necessary, reasonable, and allowable costs, based on the Uniform Guidance Subpart E - Cost Principles*

CORE ACTIVITY 3: Financial Management

CORE MONITORING GUIDE

Objective 3.g: Cost Allocation

- ▶ The grant recipient allocates costs including indirect costs to the benefitting cost objectives based on relative benefits received and treats allocated costs consistently within its accounting system.

Common Findings

- ▶ *Staff is not keeping accurate timesheets, allocating time based on formula and not on actual hours spent on the grant.*
- ▶ *The grantee is charging indirect costs without a current Negotiated Indirect Cost Rate Agreement (NICRA) in place*

Objective 3.h: Audit and Audit Resolution

- ▶ The grant recipient adheres to the single or program-specific audit requirements and has an audit resolution process in place including debt collection for its subrecipients.

Common Findings

- ▶ *The required Single Audit has not been performed*
- ▶ *The grantee does not have a system in place to ensure that subrecipients' audits are conducted and resolved*

Appendix: Resources and Tools

CORE MONITORING GUIDE

Selected Items

RESOURCES

- A:** Selected Definitions and Acronyms
- B:** Cross Reference of Grant Management Requirements
- C:** Order of Precedence
- I:** List of Items Requiring Prior Approval
- J:** Procurement Standards
- K:** Background for Contract Provisions
- L:** Retention of Records Table

TOOLS

- E:** Budget Comparison Tool
- F:** Procurement / Purchasing Policy checklist
- G:** Procurement History File
- H:** Subaward Review Worksheet
- I:** Contract Review Checklist
- J:** Subrecipient Monitoring Reports Worksheet
- K:** Policies and Procedures Checklist
- L:** Separation of Duties Worksheet
- M:** Worksheet for Evaluating Allowable Match Items
- O:** Cost Allocation Worksheet

Policy and Procedures Checklist

CORE MONITORING GUIDE

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



Questions?

Smart 3.0 training series

1. [ETA Grant Management Overview: Readiness Assessment](#)
2. [Financial Management: Procedures and Internal Controls](#)
3. [Subrecipient Management and Oversight](#)
4. [Uniform Guidance: Cost Principles and Cost Classification](#)
5. [Procurement and Contract Administration](#)
6. [Budget Management and Grant Modifications](#)
7. [Real Property and Leases](#)
8. [Payments and Cash Management](#)
9. [Complaints, Grievances, and Incident Reporting](#)
10. [Financial Reporting and Program Income](#)
11. [Records Management and Closeout](#)
12. [Cost Sharing/Match and Leveraged Resources](#)
13. [Audits and Audit Resolution](#)
14. [Cost Allocation Plans and Indirect Costs](#)
15. [Property Management: Supplies, Equipment, and Intangible Property](#)





Thank You!

Evaluation Link in the chat

Next session starts at 2:00 pm