



# U.S. Department of Labor Employment and Training Administration

## *Grant Management and Monitoring - Discretionary Grantees*

*Pacific Northwest Workforce Development Forum  
April 20-22, 2010  
Seattle, Washington*



# COMMON FINDINGS & HOW TO AVOID THEM

- Monitoring Overview
- Common Findings
- Tips for Avoiding Findings



# COMMON FINDINGS & HOW TO AVOID THEM

## Purpose of Monitoring

- Ensure that the Department of Labor grant funded program is aligned with:
  - Statute/Regulations/Grant terms & conditions
  - Federal financial and administrative requirements including cost principles
  - Grant Solicitation for Grant Application
- Identify promising practices that can be shared
- Identify technical assistance needs



# COMMON FINDINGS & HOW TO AVOID THEM

## Monitoring Methods

- Types of Monitoring:
  - Quarterly Performance Reviews
  - Desk Monitoring Reviews
  - On-Site Reviews



# COMMON FINDINGS & HOW TO AVOID THEM

## On-Site Reviews: Basics

- Who conducts On-Site Reviews?
  - FPO (additional ETA Staff)
- When is the review conducted?
  - Usually midpoint during your grant period of performance
- What is the duration of the review?
  - Usually 2-3 days
- Notification of Review:
  - Letter confirming scheduled date of review and Core Monitoring Guide/Review Planning Tool mailed to Grant Recipient

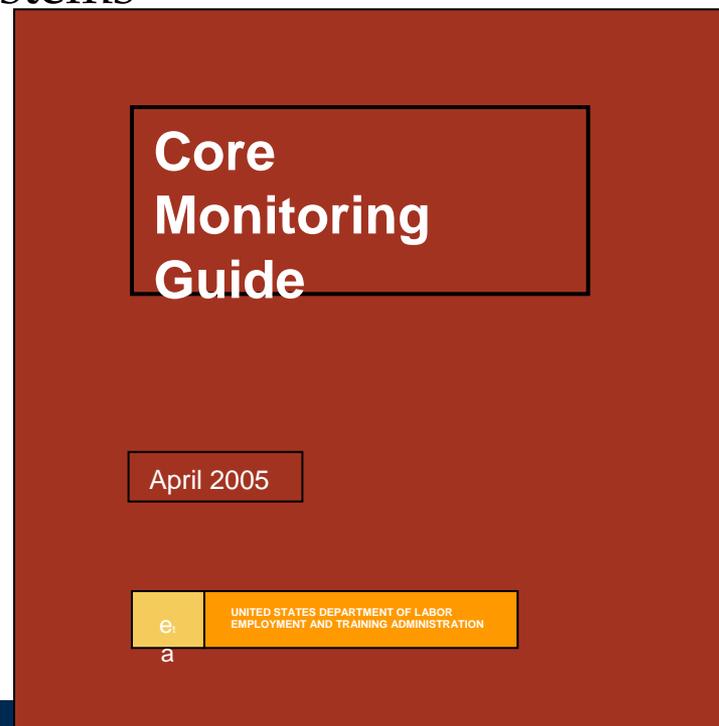
# COMMON FINDINGS & HOW TO AVOID THEM

## On-Site Reviews: Tools

### DOL ETA uniform guide for monitoring

#### - Five Core Activities

- Design and governance
- Program / Grant Management Systems
- Financial Management Systems
- Service/product Delivery
- Performance Accountability





# COMMON FINDINGS & HOW TO AVOID THEM

## On-Site Reviews: Tools

### REVIEW PLANNING TOOL U.S. DOL ETA Core Monitoring Review Guide

Grantee: \_\_\_\_\_

Review Date: \_\_\_\_\_

FPO: \_\_\_\_\_

Checked items indicate the activities/objectives that will be included in the monitoring review. To help plan the review, please fill in the names and titles of staff responsible for each activity/objective. Please refer to the Core Monitoring Guide for the detailed description of each core activity and objective.

H

REVIEW ACTIVITIES & OBJECTIVES	DOCUMENTS TO MAKE AVAILABLE FOR REVIEW	INTERVIEW	NAME & TITLE
<b>CORE ACTIVITY 1: DESIGN AND GOVERNANCE—2 Hours</b>			
x <b>1.1 Strategic Planning</b>	<ul style="list-style-type: none"> <li>Grantee organization's vision, mission, strategy, and action planning documents</li> <li>Labor Market Information (LMI) used by the grantee organization to identify its area's high-growth businesses and industries, their workforce needs, and the need for certain skills and competencies.</li> </ul>	<ul style="list-style-type: none"> <li>Grantee leadership/management staff</li> <li>Primary staff responsible for LMI analysis</li> <li>Business, industry and employer partners</li> </ul>	
x <b>1.2 Service Design</b>	<ul style="list-style-type: none"> <li>Resource mapping tools</li> <li>Customer satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>Grantee management; staff responsible for providing business and job seeker services</li> </ul>	
x <b>1.3 Program Integration</b>	<ul style="list-style-type: none"> <li>Policies, memoranda or documentation of program integration</li> </ul>	<ul style="list-style-type: none"> <li>Appropriate staff</li> <li>Local Workforce Investment Board, One-stop or other workforce investment partners as appropriate</li> </ul>	
<b>CORE ACTIVITY 2: PROGRAM AND GRANT MANAGEMENT SYSTEMS Estimated Time Needed—3 hours</b>			
<input checked="" type="checkbox"/> <b>2.1 Administrative Controls</b>	<ul style="list-style-type: none"> <li>Policies and Procedures for core management functions and program operations</li> <li>Monitoring tools and procedures and documentation of monitoring</li> <li>Record retention and access policy</li> </ul>	<ul style="list-style-type: none"> <li>Primary staff responsible for development and issuance of policy, monitoring, and record retention</li> </ul>	
<input checked="" type="checkbox"/> <b>2.2 Personnel</b>	<ul style="list-style-type: none"> <li>Personnel policy, including hiring process and procedures</li> <li>Grantee organizational chart</li> <li>Project organizational chart</li> </ul>	<ul style="list-style-type: none"> <li>Staff responsible for personnel and human resources; other staff as appropriate</li> </ul>	
<input checked="" type="checkbox"/> <b>2.3 Civil Rights</b>	<ul style="list-style-type: none"> <li>Grievance/complaint resolution and non-discrimination policies and procedures</li> </ul>	<ul style="list-style-type: none"> <li>Equal Opportunity officer and/or staff assigned responsibility for ensuring organization's compliance with the EO laws</li> </ul>	



# COMMON FINDINGS & HOW TO AVOID THEM

## On-Site Reviews: Process/Report

- Exit Conference
  - Preliminary findings and observations
- Written Report
  - Findings and required corrective actions
  - Opportunities for improvement
  - Positive observations



# COMMON FINDINGS & HOW TO AVOID THEM

## On-Site Reviews: Definitions

- Definition
  - A finding is any “violation of”
    - Law
    - Regulations
    - Grant agreement
    - SGA requirement



# COMMON FINDINGS & HOW TO AVOID THEM

## Common Findings

- Changes were made to the Statement of Work without Grant Officer approval
  - Change in scope or objective
  - Adding/deleting program component
  - Adding/deleting partner
  - Adding/deleting YB construction worksites
  - Changing target group



# COMMON FINDINGS & HOW TO AVOID THEM

## Common Findings

- The Equal Opportunity (EO) requirements are not being fully implemented:
  - The EO notice does not contain the required wording *29 CFR 37.30* and/or;
  - The EO notice is not posted or provided to participants and made a part of their file and/or;
  - Program brochures/outreach materials do not contain the required wording *29 CFR 37.34*

# COMMON FINDINGS & HOW TO AVOID THEM

## Common Findings

- Grant funds were used to purchase equipment without Grant Officer approval
  - Unit cost of \$5000 and useful life of one year
  - Prior approval required even if included in the budget



# COMMON FINDINGS & HOW TO AVOID THEM

## Common Findings

- The Grant Recipient realigned the budget without prior Grant Officer approval
  - Exceeded the 20% line item flexibility requirement
  - Made any changes to Personnel, Fringe or Indirect Cost line items



# COMMON FINDINGS & HOW TO AVOID THEM

## Common Findings

- Subrecipients are not monitored
  - Every program, project, subaward, function and activity must be monitored
  - Need monitoring process, schedule, documentation and corrective action process

# COMMON FINDINGS & HOW TO AVOID THEM

## Common Findings

- Acknowledgement of funding source is missing
  - % of project funded with Federal funds
  - Total amount of Federal funds



# COMMON FINDINGS & HOW TO AVOID THEM

## Common Findings

- Project significantly behind schedule in achieving grant goals/deliverables
  - Grantees must immediately notify DOL of developments which have significant impact on grant activities

# COMMON FINDINGS & HOW TO AVOID THEM

## Common Findings

- Quarterly financial and progress reports are submitted after the due date
  - Reports are due 45 days after the end of the quarter, i.e. February 14, May 15, August 14, November 14
  - If due date falls on Saturday, Sunday, or holiday, reports are due on prior workday



# COMMON FINDINGS & HOW TO AVOID THEM

## Useful Tips

- Knowledge of Requirements
- Ensure Core Monitoring Guide/Review Planning Tool are shared with appropriate staff early on
- Attend Training
- Implement the Common Findings Hand-out
- Ask Questions (contact your FPO)



# U.S. Department of Labor Employment and Training Administration

# *Questions??*

