



Monitoring Reviews, Common Findings and How To Avoid Them

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U.S. DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

**ARRA GREEN JOB AND HEALTH
CARE / EMERGING INDUSTRIES
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Monitoring Reviews, Common Findings and How To Avoid Them



What would you like to learn more about in today's session?



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

**Core
Monitoring
Guide**

April 2005

UNITED STATES DEPARTMENT OF LABOR
EMPLOYMENT AND TRAINING ADMINISTRATION

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.

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



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
 - 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 grant budget
 - This requirement also applies to subrecipients



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

- Project significantly behind schedule in implementing grant activities
 - Slow start-up
 - Low expenditures/drawdowns
 - Grant recipients must immediately notify DOL of developments which have significant impact on grant activities



COMMON FINDINGS & HOW TO AVOID THEM

Common Findings

Procurement files do not contain required support documentation

- Basis for contractor selection
- Justification of lack of competition
- Basis for award cost or price



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)



QUESTIONS?

