Grant Management and Monitoring – Discretionary Grantees

Southern California Training and Technical Assistance Forum
May 27, 2010
Los Angeles, California
What is something you want to know more about in today’s session?
COMMON FINDINGS & HOW TO AVOID THEM

- Monitoring Overview
- Common Findings
- Tips for Avoiding Findings
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
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
DOL ETA uniform guide for monitoring

- Five Core Activities
  - Design and governance
  - Program / Grant Management Systems
  - Financial Management Systems
  - Service/product Delivery
  - Performance Accountability
## REVIEW PLANNING TOOL

**U.S. DOL ETA Core Monitoring Review Guide**

<table>
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<tr>
<th>Grantee:</th>
<th>Review:</th>
<th>Date:</th>
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<td>FPO:</td>
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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.

### REVIEW ACTIVITIES & OBJECTIVES

#### CORE ACTIVITY 1: DESIGN AND GOVERNANCE—2 Hours

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| **1.1 Strategic Planning**      | • 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.  
 • Resource mapping tools  
 • Customer satisfaction surveys | • Grantee leadership/management staff  
 • Primary staff responsible for LMI analysis  
 • Business, industry and employer partners  
 • Grantee management; staff responsible for providing business and job seeker services | |
| **1.2 Service Design**          | • Resource mapping tools  
 • Customer satisfaction surveys | • Grantee leadership/management staff  
 • Primary staff responsible for LMI analysis  
 • Business, industry and employer partners  
 • Grantee management; staff responsible for providing business and job seeker services | |
| **1.3 Program Integration**     | • Policies, memoranda or documentation of program integration | • 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

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| **2.1 Administrative Controls** | • Policies and Procedures for core management functions and program operations  
 • Monitoring tools and procedures and documentation of monitoring  
 • Record retention and access policy | • Primary staff responsible for development and issuance of policy, monitoring, and record retention | |
| **2.2 Personnel**               | • Personnel policy, including hiring process and procedures  
 • Grantee organizational chart  
 • Project organizational chart | • Staff responsible for personnel and human resources; other staff as appropriate | |
| **2.3 Civil Rights**            | • Grievance/complaint resolution and non-discrimination policies and procedures | • Equal Opportunity officer and/or staff assigned responsibility for ensuring organization’s compliance with the EO laws | |
On-Site Reviews: Process/Report

- Exit Conference
  - Preliminary findings and observations
- Written Report
  - Findings and required corrective actions
  - Opportunities for improvement
  - Positive observations
On-Site Reviews: Definitions

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

- 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
• Subrecipients are not monitored
  – Every program, project, subaward, function and activity must be monitored
  – Need monitoring process, schedule, documentation and corrective action process
• Project significantly behind schedule in achieving grant goals/deliverables
  – Grantees must immediately notify DOL of developments which have significant impact on grant activities
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)
Any questions?

Thank you for attending!
Todd Yamamoto, ETA/Region 6, Regional Director, Office of Special Initiatives & Demonstrations
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