

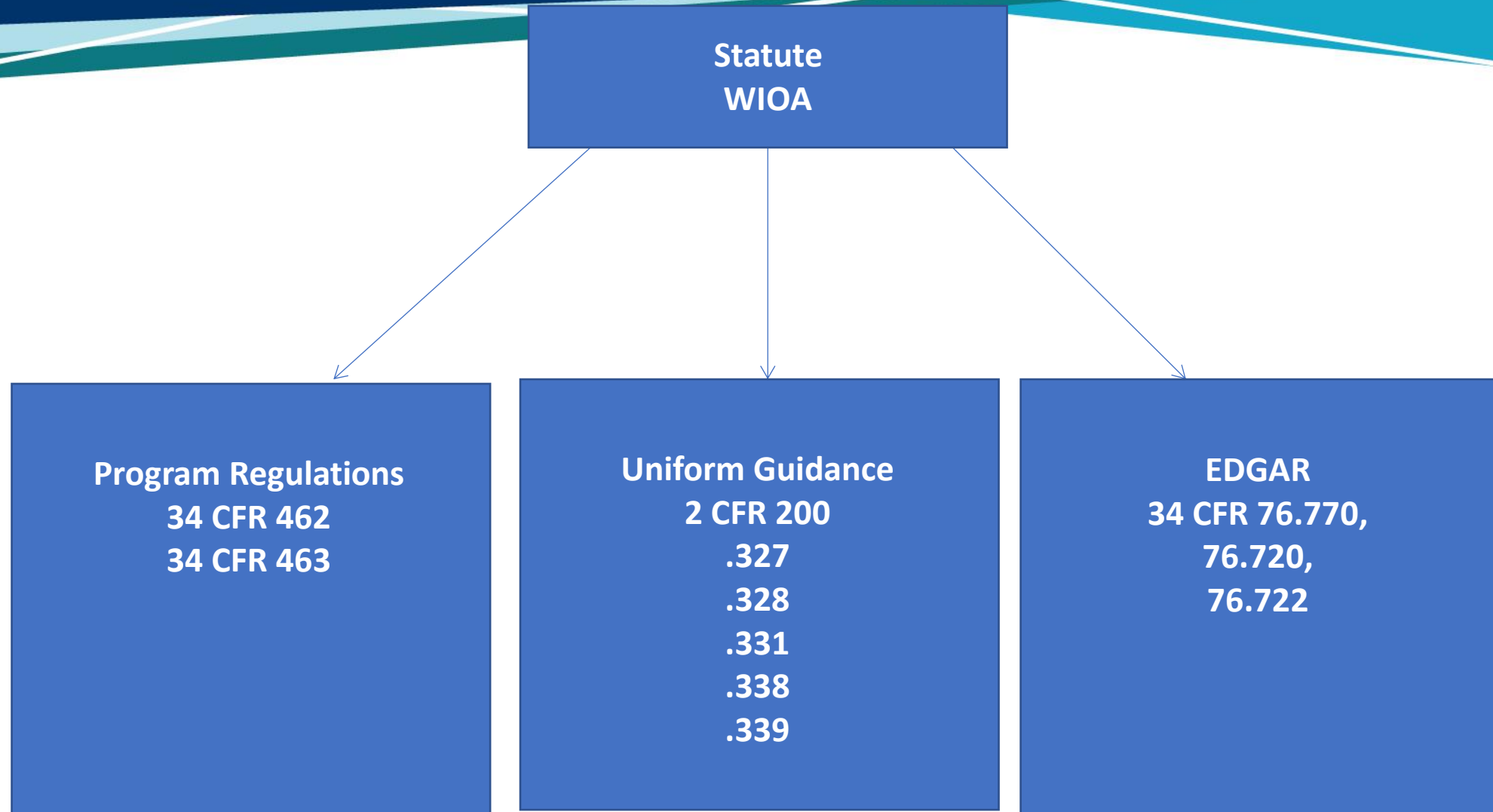


Monitoring Local Providers

Goals

- Understand monitoring requirements found in the law and regulations
- Identify the areas to monitor to meet the requirements
- Consider some ways to monitor and tools to use
- Know where seek help, answers to any questions, and additional resources

Requirements for Monitoring Local Providers



WIOA Requirements: State Monitoring of Local Providers

Are your local providers:

- Serving eligible adults?
- Carrying out allowable activities?
- Using AEFLA funds in ways that are allowable under the statute?
- Meeting acceptable levels of performance?
- Providing the State with data that is valid and reliable?
- Fulfilling their one-stop partner roles and responsibilities?

Uniform Guidance (UG) Requirements: State Monitoring of Local Providers

2 CFR 200 subpart:

- .327 – Financial Reporting
- .328 – Monitoring and Reporting Program Performance
- .331 – Requirements for Pass-through Entities [States]
- .338 – Remedies for Noncompliance
- .339 – Termination

UG Monitoring of Subrecipients

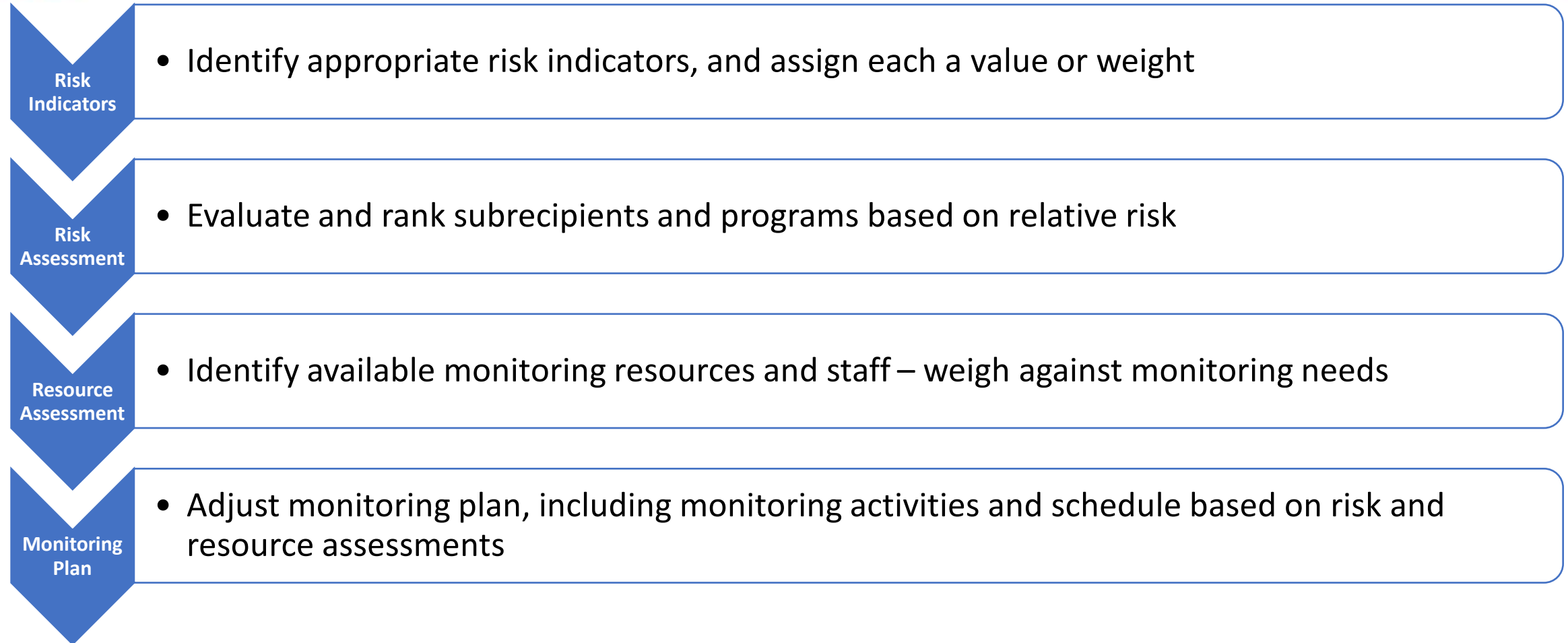
- 2 CFR 200.331 – Requirements for Pass-through Entities [States]

Eight Steps in Administering Federal Funds:

- Identify award elements
- Evaluate risk
- Impose conditions
- Monitor award
- Provide assistance
- Verify audit
- Modify process
- Take action on non-compliance

Using a Risk-Based Monitoring Approach

2 CFR 200.331(b)



Required Risk Factors in a Risk-Based Monitoring Approach

2 CFR 200.331(b)

Risk Indicator

- Review financial and performance reports

Risk Indicator

- Ensure that the subrecipient takes timely and appropriate action on all deficiencies and take enforcement action if not

Risk Indicator

- Issue a management decision for audit findings

Risk Indicator

- Verify that every subrecipient is audited as required

Using a Risk-Based Monitoring Approach

2 CFR 200.331(b)



Risk Assessment

- Evaluate subrecipients and programs against risk indicators
- Rank subrecipients and programs by risk
- Use data analysis and automation to make process more efficient
- Perform analysis regularly to account for changes in risk

Commonly Used Types of Monitoring

Scheduled monitoring reviews are organized and planned engagements with a grantee and may include one or more of the following methods:

- Desk Monitoring
 - Resources: AIR Desk Monitoring training on-line
 - <http://www.nrsweb.org/trainings/events/DeskMonitoringTraining2007.aspx>
- On-Site Monitoring
 - Resources:
 - ED Subrecipient Monitoring Webinar and Resources <http://www2.ed.gov/policy/gen/leg/recovery/web-conferences.html>
 - DAEL Local Monitoring Instrument (currently being updated)
 - AEFLA Resource Guide
- Other monitoring techniques that ensure effective monitoring of grantee progress in meeting performance standards and compliance with grant requirements
 - <https://www2.ed.gov/policy/gen/leg/foia/acsods1102.pdf>

Monitoring Activities

Develop protocols that identify and document program, financial, administrative, and performance compliance findings.

Protocols should include, but are not limited to:

- Standard grant monitoring activities;
- Program-specific templates and tools;
- Processes for opening and exit conferences that include a description of what should be communicated to a grantee during these conferences;
- A timeline and procedure for issuing monitoring reports;
- Guidelines for development and implementation of a Corrective Action Plan (CAP);
- Process for reviewing and approving CAPs;
- A process for obtaining a grantee's response to the draft or final monitoring report, as appropriate; and,
- Resolution of findings of noncompliance.

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Monitoring Local Providers

Activity: Elements of a Quality Monitoring Plan

- Divide into 6 groups
- 10 Minutes: Discussion
- 10 Minutes: Report out

Resources

Education Department

- **Onsite Monitoring** - ED Subrecipient Monitoring Webinar and Resources
<http://www2.ed.gov/policy/gen/leg/recovery/web-conferences.html>
- **Guide for Managing Formula Grant Programs** - <https://www2.ed.gov/policy/gen/leg/foia/acsods1102.pdf>
- *AEFLA Resource Guide*

AIR

- **Smart Fiscal Management training online**
<http://www.nrsweb.org/trainings/events/SmartFiscalManagement2011.aspx>
- **Desk Monitoring training online** <http://www.nrsweb.org/trainings/events/DeskMonitoringTraining2007.aspx>
- **NRS Linking Data Quality with Action Guide**
<http://www.nrsweb.org/trainings/events/LinkingDQAction2014.aspx>

Federal Audit Clearinghouse

- <https://harvester.census.gov/facweb> Or Contact: 1-800-253-0696 / erd.fac@census.gov

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