Workforce Training and Education Coordinating Board
Grant Sub-Recipient Monitoring

The Workforce Training and Education Coordinating Board (WTECB) formally monitors grant sub-recipients once a year. This document was created to help you prepare for both the on-site monitoring visit and WTECB "desk review" of documentation. Please contact your WTECB grant manager with any questions.

ON-SITE VISIT AGENDA

Monitoring visits will typically run from 9:30am – 4:30pm and the following is a general outline of the agenda. Your grant manager will be contacting you at least one week prior to the visit to finalize the agenda for your visit. *Please note that the visit agenda will include an hour-long lunch break.*

TIME REQUIRED	SUBJECT	REQUIRED STAFF
1-2 hours	Partner Site Visit *(this will happen before the entry interview or after the Pre-Exit Interview - at 9:30am or 2:30pm – depending on what is best for your partner)*	Program Manager
1 hour	Entry Interview – Project Management Review	Agency leadership and all project staff
2 hours *(will take place at same time)*	Program Delivery Review	Program Manager
	Fiscal Review	Fiscal staff
30 min – 1 hour	Pre-Exit Interview	Agency leadership and all project staff
1-2 hours	Partner Site Visit *(this will happen before the Entry Interview or after the Pre-Exit Interview - at 9:30am or 2:30pm – depending on what is best for your partner)*	Program Manager

REQUIRED ITEMS FOR ON-SITE MONITORING

Please prepare the following items for your on-site monitoring visit. The items that have numbers listed next to them correspond to the U.S. Department of Labor's Core Monitoring Guide sections. Please refer to the guide for more specific information about each item (http://www.doleta.gov/regions/reg02/documents/OSID%20Conference/Resource%20-%20Core-Monitoring-Guide.pdf).

Project Management

- ☐ Prepare a hand-out with up to date participant outcome information, including (but not limited to) # enrolled, # started training, # completed training, # earned industry-recognized credentials, # placed in employment, # placed in training-related employment, and # retained employment for two quarters after placement.

Program Delivery

- ☐ Arrange for a short training partner site visit (see agenda above)
- ☐ If providing case management, assessment services, basic skills training, supportive services or follow-up services with grant funding, provide copies of policies and procedures related to those activities. (4.1)

- ☐ Arrange for participant files/documentation to be at your office (or accessible electronically from your office). (4.2) We would like to review files/documentation for the following participants:

Fiscal

POLICIES AND PROCEDURES:

- ☐ Cash management policies and procedures (3.2)
- ☐ Policies and procedures used to determined allowable costs (3.5)
- ☐ Policies and procedures for separation of duties or other safeguards in place to prevent unauthorized purchases and disbursements of grant funds (3.6)
- ☐ Procurement policies and procedures. (2.7)
- ☐ Program Income policies and procedures (3.3)
- ☐ Policies and procedures for distributing program costs, staff time, and general and administrative costs among programs (3.4)
- ☐ Record retention and access policies and procedures

OTHER DOCUMENTS:

- ☐ Organizational chart
- ☐ Documentation to demonstrate the use of accrual accounting methods (3.7)
- ☐ Audit and Audit Resolution: A copy of the most recent Single audit (required if expending more than $500,000 of federal funds during the fiscal year - see p. 15 of Exhibit A and OMB Circular A-133). A written status report of questioned costs and findings as a result of the latest Single Audit performed, if applicable (2.8)
- ☐ Organization's and project's most current approved budget (3.1)
- ☐ Cost allocation plan (3.4)
- ☐ Summary and documentation of program revenue and expenses for the last month invoiced (including a listing of staff and the percentages they charge to the grant; actual time sheets for those staff for the last month invoiced; samples of travel and vendor (sub-contractor) payments). *Please note that it may be necessary to see back-up documentation for additional timeframes* (3.2)
- ☐ Summary and documentation of leveraged resources reported in the last quarterly report submitted.
- ☐ Documentation of grant-related procurement activities. (2.7)

REQUIRED ITEMS FOR DESK REVIEW

On the day of the on-site monitoring visit, please provide paper or electronic copies of the following documents to the Workforce Board grant manager. These documents will be reviewed at the Workforce Board office following the on-site visit. For ease of review, please number the items as they are listed below.

Project Management

PM1. Vendor (agency sub-grantee) monitoring tools and/or a description of the process used to monitor vendor activity.

PM2. Personnel policy, including hiring process and procedures (2.2)

PM3. Agency organizational chart (2.2)

PM4. Project organizational chart (2.2)

PM5. Civil Rights Policies and Procedures (2.3)

PM6. Documentation of Commercial general liability insurance (Policy no less than one million dollars coverage per occurrence (p. 10 of Exhibit A))

PM7. Documentation of Automobile liability insurance (Policy no less than one million dollars coverage per occurrence (p. 10 of Exhibit A))

PM8. Documentation of Fiduciary Bonding coverage (Coverage of $100,000 or the highest planned advance or reimbursement for the program year (p. 10 of Exhibit A))

PM9. Drug Free Workplace policy (see p. 10 of Exhibit A and 29 CFR part 98)

PM10. Conflict of Interest policy (see Exhibit N page 14 (ESD WIA policy 3420))

PM11. Grievance and complaint policy and procedure (See Exhibit N page 16 (ESD WIA policy 3440))

PM12. Web addresses and printed material advertising/providing information about the project (required taglines)

PM13. Curriculum paid for by the project (required taglines)

PM14. Whistleblower Protection Policy (see #8 in the ARRA Provisions)

Program Delivery

PD1. Copies of vendor contracts and agreements (5.3)

PD2. One sample report from a vendor (5.3)

PD3. Contact information for employer, training and other program partners (4.5)

Fiscal

F1. Summary and documentation of program revenue and expenses for the last month invoiced (including a listing of staff and the percentages they charge to the grant; actual time sheets for those staff for the last month invoiced; samples of travel and vendor (sub-contractor) payments). *Please note that it may be necessary to see back-up documentation for additional timeframes* (3.2)

F2. Summary and documentation of leveraged resources reported in the last quarterly report submitted.

Workforce Training and Education Coordinating Board
Grant Sub-Recipient Monitoring Tool

Sub-Recipient Information

Agency: _____

Program Name: _____

Address: _____

_____

Type of Agency:
- ☐ Local Government
- ☐ Nonprofit Organization
- ☐ School District
- ☐ Other:

Contact Person: _____ Title: _____

Phone Number: _____

E-Mail Address: _____

Contract Information

Contract Number: _____

Contract Amount: _____

Contract Period: _____

Funding Source: _____

Date of On-Site Monitoring: _____

WTECB Staff: _____

Sub-recipients are assessed both for the extent to which they meeting contract requirements and whether they are "on track" to meet the goals of the grant and their workplan. The items in the tables below that have numbers listed next to them correspond to the U.S. Department of Labor's Core Monitoring Guide sections. Please refer to the guide for more specific information about each item (http://www.doleta.gov/regions/reg02/documents/OSID%20Conference/Resource%20-%20Core-Monitoring-Guide.pdf).

GRANT SUB-RECIPIENT ON-SITE REVIEW

PROJECT MANAGEMENT ON-SITE REVIEW ITEMS - General

(S=strong, M=moderate, and W=weak)

MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
1.3 Program Integration	▪ Program is supported by leadership and integrated into the organization				
2.1 Administrative Controls	▪ Systems for core management functions and program operations ▪ Do systems allow for evidenced- based decision-making				
1.2 Service Design	▪ The service delivery system is designed to accomplish strategic goals and objectives ▪ Program is integrated with other similar local efforts, or has established effective partnerships to aid service delivery and improve participant outcomes.				
2.4 Sustainability	▪ The organization has identified aspects of the program that should be sustained, either through new resources or by integrating proven practices into existing activities. ▪ The organization has identified resources and/or created a plan that will support project activities after expiration of the grant. ▪ A plan is in place for continuation of services to participants who have not completed the program by the end of the grant period.				

5.1 Service Goals	▪ Project implementation plan, identifying project goals, activity levels, spending targets, and timeframes that are directly linked to achieving grant goals. ▪ Most recently available enrollment reports ▪ Most recently available expenditure reports				
Staff Communication and Timeliness	▪ Regular communication from agency staff regarding program progress and technical assistance needs ▪ Timeliness with reports and other items due to the Workforce Board				

Project Management Successes:

Project Management Challenges:

Project Management Technical Assistance Needs:

PROGRAM DELIVERY ON-SITE REVIEW ITEMS - General

(S=strong, M=moderate, and W=weak)

MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
2.3 Civil Rights	▪ The sub-recipient location and facility, or part of the facility, is physically accessible to and usable by disabled individuals. ▪ Notices should be in languages and reading levels appropriate to population served ▪ Equal Opportunity is Law is posted (see p. 21 of Exhibit A and 29 CFR part 37.30)				

4.1 Operating Systems	▪ Systems/procedures for working with vendors and partners ▪ Eligibility procedures and documentation requirements ▪ Supportive services policy and documentation, if applicable ▪ How are participants made aware of your grievance and complaint policy and procedure (See Exhibit N page 16 (ESD WIA policy 3440))				
4.4 Integrated Services	▪ Service flow plans ▪ Non-financial agreements of memoranda of understanding with partners participating in the project (financial agreements to be reviewed during desk review)				
4.5 Business/Other Partner Relationships	▪ Strong business and other partnerships ▪ Partner site visit ▪ Articulated role of business and labor in strategic planning or decision-making.				
2.9 Reporting Systems & 5.2 Performance Outcomes	▪ Strong procedures/systems for data collection/reporting				
5.4 Performance Data	▪ Description of the process used to assess and improve the quality of service/product delivery based on performance data				
4.2 Participant Files	▪ Review participant files for required documents, including eligibility, support service and performance measure documentation. ▪ Look for evidence of at least monthly interaction with participants by job or education counselor/case manager.				

PROGRAM DELIVERY ON-SITE REVIEW ITEMS – ARRA HGEI Grant Related

(S=strong, M=moderate, and W=weak)

MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
Buy American	▪ None of the grant funds may be used for a project for the construction, alteration, maintenance or repair of a public building or pubic work unless all of the iron, steel and manufactured goods used in the project are produced in the U.S. (see #9 in the ARRA Provisions and ARRA Sec. 1605)				

Program Delivery Successes:

Program Delivery Challenges:

Program Delivery Technical Assistance Needs:

FISCAL ON-SITE REVIEW ITEMS - General

(S=strong, M=moderate, and W=weak)

ADMINISTRATIVE					
MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
Background	▪ Contract ▪ 29 CFR Part 95 or 29 CFR Part 97 ▪ OMB Circular A-87 or OMB Circular A-122				
3.6 Internal Controls	▪ Policies and procedures for separation of duties or other safeguards in place to prevent unauthorized purchases and disbursements of grant funds ▪ Organizational chart				
Accounting 3.7 Financial Reporting	▪ Description of accounting system including accrual and vendor reporting ▪ Procedure and documentation to demonstrate the use of accrual accounting method				

3.2 Cash Management	▪ Organization's cash management policies and procedures ▪ Summary and back-up documentation of revenue and expenditures for the last month invoiced ▪ Staff timesheets ▪ Documentation of monitoring cash management activities of vendors, if applicable				
3.1 Budget Controls	▪ Organization's/project's most current approved budget ▪ Method to compare actual line expenditures to budgeted line item amount				
2.8 Audit and Audit Resolution	▪ A system is in place for an audit of financial activity in accordance with the provisions of OMB Circular A-133 ▪ A copy of Single audit (required if expending more than $500,000 of federal funds during the fiscal year - see p. 15 of Exhibit A and OMB Circular A-133) ▪ Audit and audit resolution process ▪ A written status report of questioned costs and findings as a result of the latest Single Audit performed, if applicable				
Record Retention and Access	▪ Record retention and access policies and procedures				
PROGRAM FISCAL					
MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
Budget Formation and Administration	▪ Budget and administrative systems review				
2.5 Match/Leveraged Resource Requirements	▪ Financial documentation of leveraged resources				
3.3 Program Income	▪ Program income policies and procedures, if applicable				

3.5 Allowable Costs	▪ Policies and procedures used to determine allowable costs ▪ Documentation of expenditures				
CROSS-CUTTING FISCAL					
MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
3.4 Payroll/Time Distribution	▪ Procedures for distributing staff time among programs ▪ Staff timesheets				
2.7 Procurement	▪ Procurement policies and procedures Procurement files for vendor contracts for services and goods procured under the grant ▪ All activities shall be conducted, as practical, to provide open and free competition (see Part IV of DOL contract)				
3.4 Indirect Costs	▪ Policies and procedures for distributing program costs, and general and administrative costs among programs				
Property Management 2.6 Equipment	▪ Policies and procedures for property management ▪ Documentation of requesting and receiving written approval prior to purchasing equipment (also see Part IV of DOL grant)				

FISCAL ON-SITE REVIEW ITEMS – ARRA HGEI Grant Related

(S=strong, M=moderate, and W=weak)

MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
Salary and Bonus Limitations	▪ None of the grant money can be used to pay the salary and bonuses of an individual at a rate in excess of Executive Level II (2010 rate is $179,700). ▪ See DOL TEGL 5-06 and Public Law 109-234, section 7013.				

Limit on Funds	▪ None of the grant funds can be used for any casino or other gambling establishment, aquarium, zoo, golf course, or swimming pool (see #3 in the ARRA Provisions)				
Wage Rate Requirements	▪ All laborers and mechanics employed on projects shall be paid wages at rates not less than those prevailing on projects of character similar in the locality as determined by the Secretary of Labor (see #7 in the ARRA Provisions and ARRA Sec. 1606)				
Consultant fee limit	▪ Consultant fees shall be limited to $585 per day				
Rebates	▪ The Workforce Board needs written advisement of any forthcoming income resulting from rebates, interest, credits or any other monies of financial benefits received as a result of or generated by these award dollars				

Fiscal Successes:

Fiscal Challenges:

Fiscal Technical Assistance Needs:

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GRANT SUB-RECIPIENT DESK REVIEW

Grant sub-recipient staff will provide documents and information related to this section for Workforce Board staff to review the at the Workforce Board office.

PROJECT MANAGEMENT DESK REVIEW ITEMS

(S=strong, M=moderate, and W=weak)

MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
2.1 Administrative Controls	▪ Monitoring tools and procedures and documentation of monitoring ▪ Record retention and access policy				
2.2 Personnel	▪ Personnel policy, including hiring process and procedures ▪ Sub-recipient organizational chart ▪ Project organizational chart				
2.3 Civil Rights	▪ Policies and procedures are developed in accordance with applicable laws and regulations that demonstrate sub-recipient's commitment to the principle of Federal Civil Rights Laws: Title VI – Civil Rights Act of 1964, Section 504 – Rehabilitation Act Title IX, Education Amendments Act of 1972, Age Discrimination Act of 1975, Section 188 of the Workforce Investment Act, 49 CFR Part 25, 29 CFR Part 35, 29 CFR Part 37				
Commercial general liability insurance	▪ Policy no less than one million dollars coverage per occurrence (p. 10 of Exhibit A)				
Automobile liability insurance	▪ Policy no less than one million dollars coverage per occurrence (p. 10 of Exhibit A)				
Fiduciary Bonding	▪ Coverage of $100,000 or the highest planned advance or reimbursement for the program year (p. 10 of Exhibit A)				

Drug Free Workplace policy	▪ see p. 10 of Exhibit A and 29 CFR part 98				
Conflict of Interest policy	▪ see Exhibit N page 14 (ESD WIA policy 3420)				
Grievance and complaint policy and procedure	▪ provide this information to all participants ▪ See Exhibit N page 16 (ESD WIA policy 3440)				
Required taglines	▪ Sub-recipients are using the DOL and Washington State required taglines				

PROJECT MANAGEMENT DESK REVIEW ITEMS – ARRA HGEI Grant Related

(S=strong, M=moderate, and W=weak)

MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
Whistleblower Protection	▪ Policy should be in place (see # 8 in the ARRA Provisions)				

PROGRAM DELIVERY DESK REVIEW ITEMS

(S=strong, M=moderate, and W=weak)

MONITORED ACTIVITIES	TO BE REVIEWED	S	M	W	Comments
5.3 Vendor Performance	▪ Copies of vendor/contractor agreements and reports				
4.5 Business/Other Partner Relationships	▪ The project provides effective services to employers and other partners (WTECB staff will contact employer and other grant partners)				
Participant satisfaction	▪ The project provides effective services and support to participants (WTECB staff will contact participants)				

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STRENGTHS, CONCERNS AND FINDINGS

OVERALL STRENGTHS:

CONCERNS (Conditions that if uncorrected could result in a potential future violation of law, regulation, grant agreement, contract or cooperative agreement, federal guidance or state or local policy. Internal control weakness and/or questionable operational/business practices that pose a risk to programs, service delivery, assets or impact customer service quality):

FINDINGS (Any violation of law; regulation; grant agreement; contract agreement; cooperative agreement or state or local policy. Reporting of findings will depend on materiality of the finding.):

ACTIONS NEEDED:

Workforce Training and Education Coordinating Board
ARRA HGEI Grant Participant File Review Checklist

Updated 8/2011

Sub-Recipient Agency: Program: Date of Review:

Participant's Name (First, Last)	Program Eligibility	Age Verification *(only for Energy grant)*	Veteran Status *(if applicable)*	Selective Service Documentation	Eligibility to work in the US documents	Proof that participant saw EEO/Grievance procedures	Selective Service Documentation	Training Started	Training Completed	Certification/Credential earned	Other Services – Basic Skills Training	Other Services – Assessment	Other Services – Case Management – evidence of at least monthly contact	Other Services – Retention and Follow-up	Other Services – Support Services	Employment Placement	Employment 1st Qtr Retention	Employment 2nd Qtr Retention	File content matches MIS records	Notes