

U.S. Department of Education

2020 New State Directors Training

The Basics of AEFLA Grants Management

December 7-15, 2020





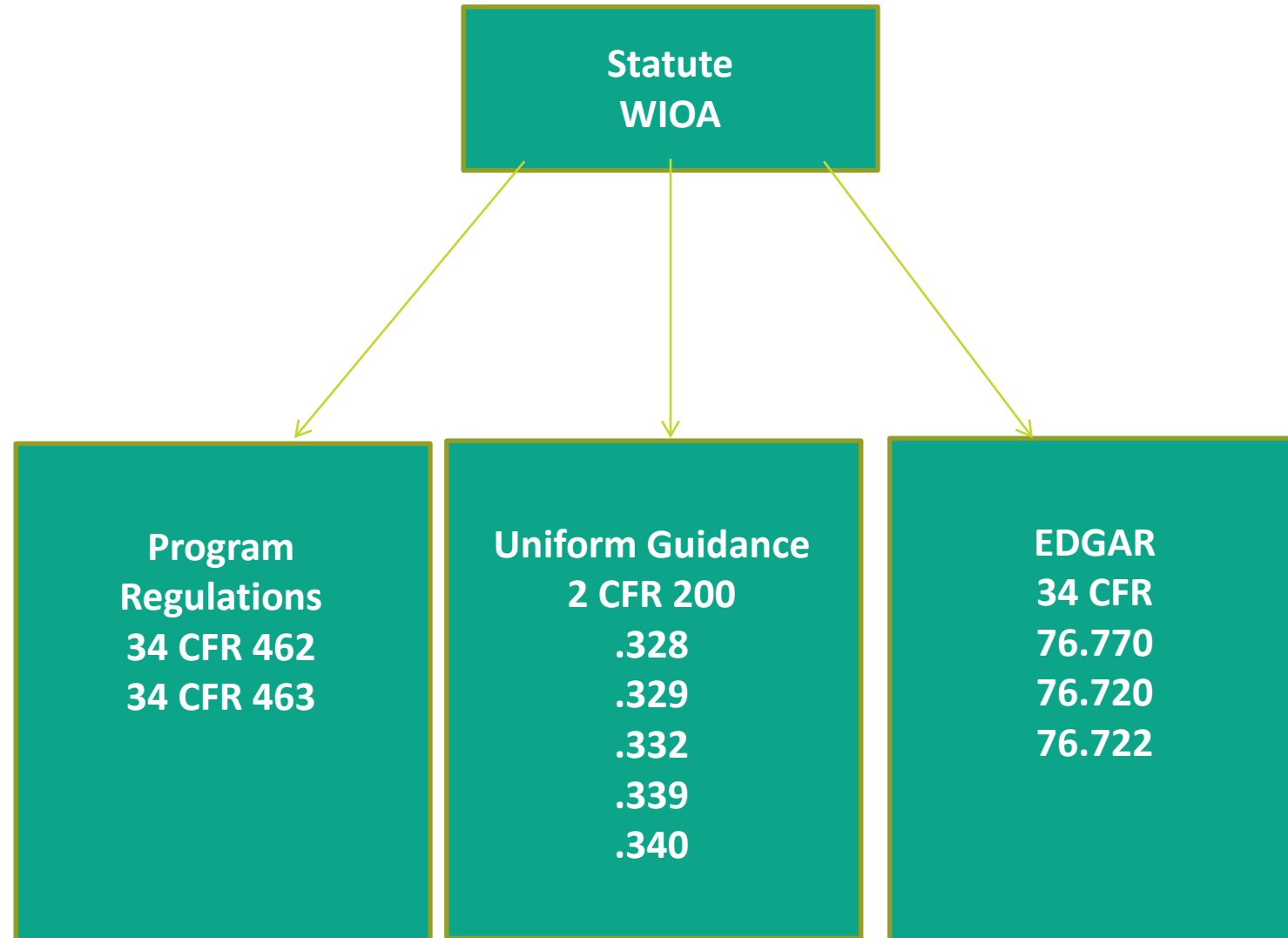
MONITORING LOCAL PROVIDERS

SHARON HARRINGTON

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

Are Your Providers:

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

2 CFR 200.332 – Requirements for Pass-through Entities [States]

Eight Steps in Administering Federal Funds:

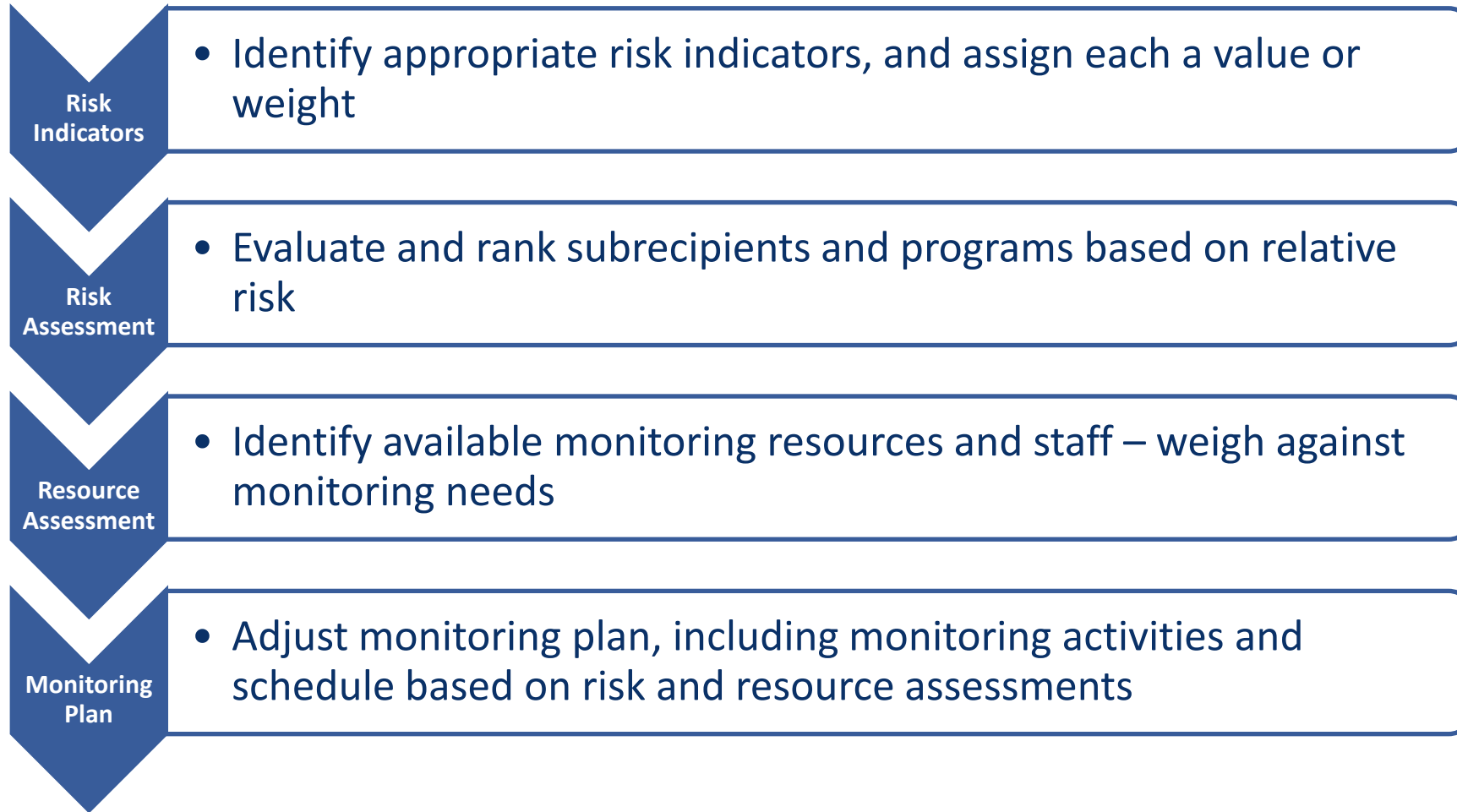
- Identify award elements
- Evaluate risk
- Impose conditions
- Monitor award
- Provide assistance
- Verify audit
- Modify process
- Take action on non-compliance



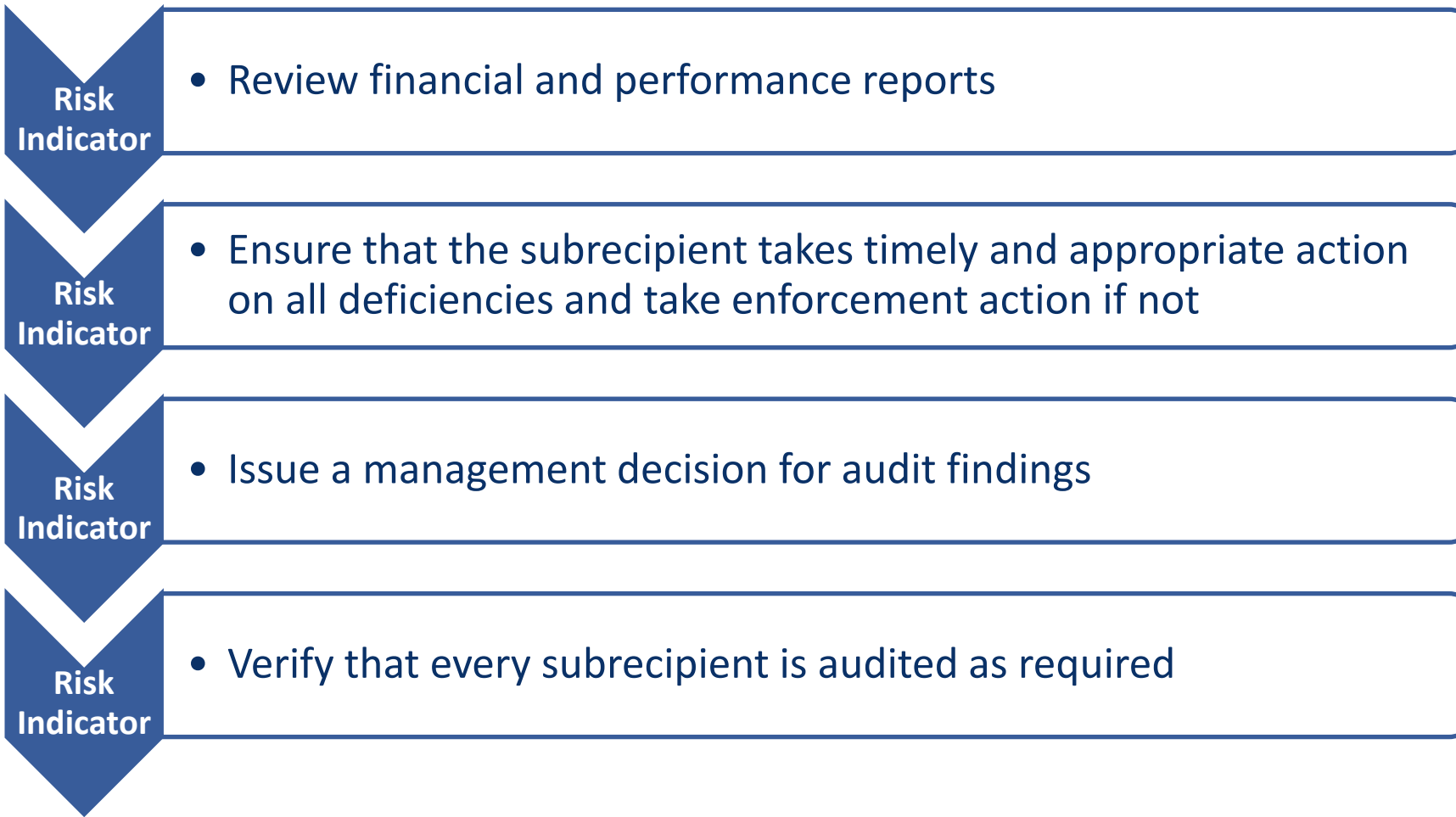
2 CFR 200 subpart:

- .328 - Financial Reporting
- .329 - Monitoring and Reporting Program Performance
- .332 – Requirements for Pass-through Entities [States]
- .339 – Remedies for Noncompliance
- .340 – Termination

Using a Risk-Based Monitoring Approach 2 CFR 200.332(b)



Using a Risk-Based Monitoring Approach 2 CFR 200.332(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

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



Monitoring: Onsite, Desk, or Combination

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
 - <https://nrsweb.org/training-ta/archive-training-events>
 - *Send an email to NRS@AIR.com for materials.*

On-Site Monitoring

- Resources:
 - ED Subrecipient Monitoring Webinar and Resources
 - <https://www2.ed.gov/policy/gen/leg/recovery/rms-web-conferences.html>
 - AEFLA Resource Guide
 - DAEL Job Aid— 2 CFR §200.332 Requirements for pass-through entities

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>

Resources

Education Department

Onsite Monitoring (ED Webinar and Resources)

<https://www2.ed.gov/policy/gen/leg/recovery/rms-web-conferences.html>

Guide for Managing Formula Grant Programs

<https://www2.ed.gov/policy/gen/leg/foia/acsods1102.pdf>

AEFLA Resource Guide

DAEL Job Aid — 2 CFR §200.331 Requirements for pass-through entities

American Institute for Research (AIR)

Smart Fiscal Management training online and Desk Monitoring training online

<https://nrsweb.org/training-ta/archive-training-events> or contact NRS@AIR.com

NRS Linking Data Quality with Action Guide

<https://www.nrsweb.org/training-ta/f2f-training/2014-summer-training>

Federal Audit Clearinghouse

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

Questions:

1. What was working well with your State's monitoring reviews before the pandemic and what adaptations have you made to continue its success?
2. What are the biggest lessons learned over the past year and what do you want your fellow State Directors and staff to know about those lessons?

Monitoring and Administration Branch

Karla Ver Bryck Block, Branch Chief

202-245-6836, Karla.VerBryckBlock@ed.gov

Area Coordinators

- **Chunee Boston, Area I, 202-245-6733, Chunee.Boston@ed.gov**
- **Stephanie Washington, Area II, 202-245-6952, Stephanie.Washington@ed.gov**
- **Sharon Harrington, Area III, 202-245-7709, Sharon.Harrington@ed.gov**
- **Kathy Killian, Area IV, 202-245-6147, Kathy.Killian@ed.gov**

Management Program Analyst

Kenneth Kalman, 202-245-7529, Kenneth.Kalman@ed.gov

