National Monitoring Training for State Agencies

PREPARATION AND PLANNING FOR MONITORING
Eric Nelson

*Director, Office of Special Initiatives and Demonstrations*

*USDOL*

✉️ nelson.eric@dol.gov

📞 215-861-5221
Objectives

• Defining the Scope
• Assembling the Monitoring Team
• Completing the Pre-Work
Defining the Scope

- Conduct Risk Assessment
  - Informed Monitoring
  - Areas to watch

- Identify Areas of Focus for Review
  - Risk Areas
  - Compliance Requirements
  - Effectiveness of Programs
Risk-Based Monitoring = Informed Monitoring

- Risk Assessment can be used as a tool to:
  - Identify high-risk grantees and local areas
  - Identify potential issues and concerns to explore on-site
Monitoring to Ensure Compliance

- Monitoring policies and procedures must align with the intent outlined by statute, regulations, and policy

- Measure compliance in key areas
  - Eligibility Determination
  - Accurate, Timely and Complete Data
  - Complete and Satisfactory Documentation
  - Access to and Delivery of Required Services
Monitoring to Ensure Effectiveness

- **Effectiveness** of the local areas/subrecipient structure, operations, and delivery of services.
  - Go beyond process-related elements.
  - Consider quality of services delivered and outcomes achieved.
Develop Scope of Review

- Based on the Risk Analysis, what will be included in the scope of this review?
  - Will it review all program and fiscal aspects of the grant?
  - Were there any red flags?

- Are there items that should have top priority in the review?

- Develop Scope
Preparation and Planning for Monitoring

ASSEMBLING THE TEAM
Assembling the Team

- Factors to Consider when Structuring your Monitoring Team
  - Size and structure of the subrecipient
  - Monitoring requirements
  - Type of grant portfolio
  - Capacity
  - Efficiency
- Expertise
- Alignment on objectives & scope
- Roles & Responsibilities for pre-, post-, and on-site monitoring work
Assembling the Monitoring Team – Considerations

- Factors to Consider in the Structuring your Monitoring Team
  - Size and structure of the subrecipient or local system,
  - Monitoring requirements
  - Type of grant portfolio
  - Capacity
  - Efficiency
Assembling the Monitoring Team – Members

- Include expertise on all areas in review scope
- Assure alignment on objectives and scope
- Delineation of roles & responsibilities for pre-, post-, and on-site work
Preparation and Planning for Monitoring

COMPLETING THE PRE-WORK
Completing the Pre-Work

- Reviewing data and documents
  - Review Risk Analysis & Scope of Review
  - Request Data
  - Review/Analyze Data

- Capturing initial thoughts, concerns, and areas to probe on-site

- Identifying and preparing on-site monitoring tools

- Identifying and Reviewing Participant File Sample
Reviewing Data & Documents

• Review the Risk Analysis and Scope of Review
• Request Data from Subrecipients
  ○ Request materials in electronic format or have access to system to pull files and materials.
  ○ Only request what is needed for the review.
  ○ Remind subrecipient to remove any PII if they are sending files directly.
• Review/Analyze Data
Examples of Data/Documents to Request

<table>
<thead>
<tr>
<th>Continuous Monitoring Activity</th>
<th>Examples of Data/Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Information</strong></td>
<td>Statement of Work (SOW), budget, cost allocation plans, policies and procedures, sub-grants or contracts, MOUs and other agreements, Local Plan, Board membership, etc.</td>
</tr>
</tbody>
</table>
| **Desk Reviews**              | • Performance data such as enrollments, placements in training and employment, retention, etc.  
• Fiscal data such as drawdowns, single audit report, etc.  
• Qualitative data such as recent meeting minutes, local news, information provided from partners.  
• May also include participant file review including case notes. |
| **Risk Assessment**           | Same sources as desk reviews but the number, type and significance of issues is applied to a set of criteria to assign a level of risk to the subrecipient. That risk category informs the timing and focus of additional monitoring activities. |
Tips for Data/Documentation Review

- Prepare files for review
- Review program-related guidance
- Use a guide/checklist when reviewing files
- Note any clarifications or follow-up questions that may be asked later
Capturing initial thoughts, concerns, and areas to probe

- Ask some clarifying questions after reviewing files and finding missing pieces.
  - It is possible that the information is there, but not obvious – asking questions keeps the dialog going with the subrecipient.
- Review concerns and additional information with the team.
Identifying and preparing on-site monitoring tools

• Draft Agenda
  ○ Schedule and organize interviews
  ○ Make sure to have a checklist and/or structure for the interviews and potential questions
  ○ List documents to be reviewed on-site

• Organize files for review and/or sharing

• Draft questions for follow-up

• Setup participant file review worksheets

• Hold a planning call with subrecipient to discuss the agenda, materials, and logistics.
# Examples of Monitoring Tools

<table>
<thead>
<tr>
<th>Tool</th>
<th>General Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monitoring Schedule or Calendar</td>
<td>Lays out all monitoring activities over a specific period of performance, such as a program/fiscal year and helps to keep the monitoring unit on track.</td>
</tr>
<tr>
<td>Entrance Conference Agenda</td>
<td>Template that discusses the purpose of the on-site monitoring, what will be reviewed, timelines, processes, and expectations during the monitoring review period.</td>
</tr>
<tr>
<td>Exit Conference Agenda</td>
<td>Template that discusses the results of the monitoring in a standard and consistent order. It also discusses the definitions of monitoring terms, next steps, timelines for the receipt of a final report and resolution of any identified issues.</td>
</tr>
<tr>
<td>Requested Information Checklist</td>
<td>Includes a list of required documents and policy to be provided by a local area/subrecipient for review.</td>
</tr>
<tr>
<td>Risk Assessment</td>
<td>Evaluates the individual categories of a program and a local area. Standards and definitions for low, medium, and high risks are defined, along with information on how the risk relates to compliance findings.</td>
</tr>
<tr>
<td>Performance/Expenditures Trackers</td>
<td>Tracks performance and expenditures for the local area/subrecipient against planned performance and expenditures. These may also be part of a desk review guide (outlined below).</td>
</tr>
<tr>
<td>Desk Review Guide</td>
<td>Provides evaluative questions to consider when reviewing performance, expenditure and drawdown reports, as well as a participant file sample from the state MIS. Should include procedures for next steps if issues are identified.</td>
</tr>
<tr>
<td>On-site Review Guide</td>
<td>Provides details and information for the monitors and local areas to understand the programmatic and fiscal monitoring requirements, along with how and what will be monitored according to federal and state regulatory requirements. Ideally, it includes references to regulations, laws, and state policy. Should also include a tool to capture results of participant files reviews where issues and notes can be tracked by individual participant as well as a financial monitoring tool to help monitoring staff determine the adequacy of internal controls and reliability of subrecipient financial management systems.</td>
</tr>
<tr>
<td>Corrective Action Plan Template</td>
<td>Allows a local area to complete a standardized form to define their corrective action to resolve identified issues.</td>
</tr>
<tr>
<td>Corrective Action Tracker</td>
<td>Tracks issues and planned corrective action by the local area and technical assistance by the state, as well as status of issue resolution.</td>
</tr>
<tr>
<td>Monitoring Report Template</td>
<td>Used by monitors when compiling the final report. It contains standard language, formatting, and layout to ensure consistent communication of findings and best practices back to the local system.</td>
</tr>
</tbody>
</table>
Features of Strong Monitoring Tools

- Easy to use and understand by both monitors and grantees
- Provides monitors with the knowledge, intent, and understanding to effectively monitor programs
- Open-ended questions that encourage a full, meaningful answer and help discover the cause of an issue
- Refers to laws, regulations, and policies for a clear understanding of the program goals and requirements
- Reflects current state workforce system vision and priorities (as typically defined in state policy and planning guidance)
- Incorporates hyperlinks to regulatory source documents
- Easily modified to meet the program requirements of a specific grant
- Shared with grantees and subrecipients of funding and potentially improved with their ongoing input
- Addresses qualitative and quantitative aspects of program assessment
- Collaboratively developed with the program manager, monitoring team, and other relevant units
- Readily available online to improve transparency and accountability
- Adaptable to individual workstyle preferences, where appropriate
- ETA’s Core Monitoring Guide
- Grants Application and Management Community of Practice
- State Monitoring & Oversight Resources
- Examples of State Monitoring Tools
  - Including monitoring policies and procedures, risk assessment tools, desk monitoring guides, monitoring analysis tools, monitoring schedules and guidance, new monitoring staff onboarding and training plans, templates for scheduling, promising practices, templates, and other tools.
Recap

- Defining the Scope
- Assembling the Monitoring Team
- Completing the Pre-Work
- State Monitoring Resources & Tools
Thank You!