

State Apprenticeship Expansion Subrecipient Management Resource



INTRODUCTION

States can use state apprenticeship expansion grants to award funding to subrecipients to increase capacity to meet the goals of the grant. States should develop policies, procedures, and tools to assess and support subrecipients in meeting performance goals. The following resource identifies best practices for subrecipient management and provides grantees with tools and resources they can use to work effectively with grant subrecipients. States should consult with their assigned federal project officer (FPO), grant agreement, and the [Uniform Guidance](#) for specific questions related to subrecipients and subrecipient management as this resource is designed to supplement, not supplant, the guidance provided.

TIPS FOR MANAGING SUBRECIPIENTS

Effective apprenticeship expansion relies on cooperative and supportive relationships with key partners such as subrecipients. A subrecipient is an entity that receives a subaward from a pass-through entity to carry out part of a federal award (2 CFR 200.1 “Subrecipient”). Important considerations for managing subrecipients include:

<i>Pre-Award</i>	<i>During Award</i>	<i>Post-Award</i>
• Create procedures that support the selection of qualified subrecipients who will succeed in their work for the grant. • Establish processes for regular performance assessment and support, data collection, invoicing, and penalties for nonperformance. • Hold a kickoff meeting to review processes for performance assessment, data collection, communication, and invoicing.	• Establish a clear scope of work unique to each subrecipient and a budget that aligns with the scope of work. • Provide clear documentation and agreements around performance assessment, data collection, performance standards, and penalties for nonperformance. • Create open lines of communication and regular check-ins between subrecipients, grant management staff, and fiscal agents.	• Develop closeout processes and procedures for final invoicing and reporting. • Hold a closeout meeting to review final invoices, final reporting, and any other state or federal requirements for closeout. • Evaluate your procedures, policies, and technical assistance (TA) and make changes to improve strategies for managing and supporting subrecipients.

SELECTING AND ONBOARDING SUBRECIPIENTS

State grantees should ensure that their selection process is robust enough to support the selection of subrecipients that are best suited to perform the work. It is helpful to include someone with apprenticeship experience to advise on the evaluation and selection process. Grantees should also confirm they are following state procurement requirements. Below are examples of selection policies and processes for onboarding and assessing subrecipients.

Examples of Scopes of Work and Requests for Proposals

The scope of work and request for proposals should align with the overall state project goal. States may also include project timelines and milestones, evaluation criteria, the budget, and any applicable federal or state policy.

[Maryland's Apprenticeship Innovation Fund Policy](#) provides information on monitoring and record retention, reporting requirements, and an example of a grant application.

South Dakota's [request for proposals](#) from apprenticeship intermediaries includes a detailed scope of work that aligns with state apprenticeship expansion goals and priorities, [criteria for evaluating proposals](#), and a [question and answer summary](#).

Risk Assessment Tools

States can use risk assessments to determine potential risks of awarding funds to subrecipients and develop performance assessment criteria. States should assess financial risk as well as performance risk when evaluating potential subrecipients.

[Idaho's Subrecipient Monitoring Plan and Tools resource](#) includes a risk assessment, financial questionnaire, compliance tasks, and checklist of information to provide to the subrecipient.

Selecting and Onboarding Checklist

Some considerations for grantees while planning their subrecipient selection and onboarding methods include:

- ☐ A description of technical requirements and detailed scope of work.
- ☐ Method for evaluation of proposals, including how the subrecipient's proposal meets the state's overall project goals.
- ☐ When and how risk assessments will take place.
- ☐ Kickoff meeting agenda with detailed information on all processes and policies, as well as how each performance target will be measured and penalties for nonperformance.

IMPLEMENTING EFFECTIVE PROCESSES WITH SUBRECIPIENTS

Processes for subrecipient performance assessment, agreement and modification requests, data collection, and responding to low performance or nonperformance are necessary to support grant performance. Grantees should work with their federal project officer (FPO) to confirm their policies and processes meet federal requirements. Review the [SMART 4.0 Training on Subrecipient Management](#) for federal requirements related to grantee policies and processes related to modification requests and subrecipient management. Review the best practices and examples below for implementing effective processes.

Performance Assessment Resources

When determining activities to review and assess subrecipient performance, consider policies and processes for the following:

- Review schedule based on the risk assessment and period of performance.
- Review structure, including what should be assessed and how based on the risk assessment and performance metrics.
- Process and timeframes for reporting findings.
- Process for resolution of findings and consequences for noncompliance and appeals.

The [Conducting Remote Monitoring Reviews](#) webinar from the U.S. Department of Labor (USDOL) provides information on how and why grantees might implement remote monitoring, and how to prepare for remote monitoring reviews. More detailed information on monitoring requirements can be found in the [USDOL Core Monitoring Guide](#). Questions on subrecipient monitoring should be directed to the grantee's FPO.

[South Dakota's Subrecipient Monitoring Guide](#) provides a chart that illustrates how to develop a performance review plan based on risk assessment results and size of the award.

[Idaho's Risk Assessment Matrix](#) provides examples of performance review activities based on risk assessment results for 15 predefined categories.

Effective Processes Checklist

When designing processes, grantees should:

- ☐ Have a performance assessment process for all subrecipients that is determined by risk assessment and award amount.
- ☐ Establish quarterly reporting and data collection processes for subrecipients.
- ☐ Conduct quarterly evaluation and review of subrecipient performance reports.
- ☐ Create a process for supporting low-performing subrecipients, including developing an action plan.
- ☐ Develop processes to address challenges linked to policy changes, redistribution of funds, or award modifications.
- ☐ Have a review process for updating any guides or TA resources.

Data Collection Resources

Grantees can create user guides for subrecipients that provide a step-by-step overview of how they should collect and report data. Grantees should schedule a regular check-in with subrecipients each quarter, prior to reporting deadlines, to respond to questions and provide TA on any issues in the data after reports have been reviewed by the state team. Grantees should update any guides or resources if there are issues that consistently arise every quarter.

[The Apprenticeship Data Alignment and Performance Technical Assistance Center](#) at the Council of State Governments can support state grantees with TA on data collection and alignment.

The [Performance Reporting tab](#) in the State Apprenticeship Expansion Community of Practice lists resources for grantees on reporting in WIPS and PIRL. Grantees can use these resources to support subrecipients with reporting.

Responding to Low Performance or Nonperformance

Grantees should ensure that subrecipients understand each of their performance targets and how they are measured. Creating quarterly performance goals with subrecipients can help grantees achieve performance goals and ensure a quicker response to potential barriers to good performance. Grantees can create a performance tracker or [data dashboard](#) to track subrecipient performance and use the results to have conversations with subrecipients about their progress and any action steps to get them back on track to reaching performance targets.

Table 1: Example of Subrecipient Performance Tracker

<i>Outcome measure</i>	Total enrolled for PY2 Q4	Total number enrolled to date	Total target	Number remaining to meet target	Percentage of total target achieved	Percentage of period of performance elapsed
Total participants enrolled in an apprenticeship program	35	74	500	426	15%	50%

When subrecipients are found to be low-performing, grantees have several ways to respond:

- Work with the subrecipient to create an action plan based on identified challenges and barriers to strong performance, setting attainable goals with added supports for achieving those goals.
- Modify the scope of work, award amount, or period of performance through a modification or no-cost extension.
- Work with the subrecipient to determine their capacity to meet the performance goals within the period of performance. In some cases, grantees might consider redistributing the awards to higher performing subrecipients in the case that low-performing subrecipients are not likely to meet their performance goals.

COMMUNICATING WITH SUBRECIPIENTS

Grantees can communicate with subrecipients in multiple ways, including holding monthly or quarterly check-in meetings, issuing policy guidance to clarify or change policies, and communicating on an as-needed basis to respond to policy or TA questions. Clear communication channels should be established connecting subrecipients to grant staff, finance staff, and any TA providers. For example, Michigan's [policy issuance](#) includes the scope of work, data collection requirements, and a monthly schedule for TA calls with subrecipients.

Effective Technical Assistance

TA is most effective when it is designed to support the subrecipient's success. When providing TA, grantees should work with subrecipients to determine their biggest need for TA based on risk assessment findings, monitoring findings, and performance data. Some potential TA topics include:

- Data collection and performance reporting
- Financial reporting
- Business and partner engagement
- Case management
- Program sustainability
- Apprenticeship program design
- Apprentice recruitment

Grantees can direct subrecipients to the [State Apprenticeship Expansion Community of Practice](#) on WorkforceGPS, the [Registered Apprenticeship Academy](#), and the [Apprenticeship Professionals Learning Network](#) for publicly available TA resources on many of these topics.

Communication Checklist

Some considerations for grantees while designing communication processes:

- ☐ Designate a point of contact for finance-related questions such as invoicing and reimbursement.
- ☐ Designate a point of contact for data collection issues and questions.
- ☐ Define a process for communicating policy changes.
- ☐ Hold monthly or bimonthly check-in calls with subrecipients.
- ☐ Develop agendas for regular check-in calls.
- ☐ Define a process for identifying TA needs and requesting TA.