**WorkforceGPS**

**Transcript of Webinar**

**National Monitoring Training for State Workforce Agencies, Effective and Efficient Monitoring Practices and Review Wrap-Up**

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JONATHAN VEHLOW: Welcome to "National Monitoring Training for State Workforce Agencies, Effective and Efficient Monitoring Practices and Review Wrap-Up."

So without further ado, I'd like to kick off our moderator today, Jennifer Friedman, with the U.S. DOL, ETA Regions 1 and 2, director of Office of State Systems. Jennifer, take it away.

JENNIFER FRIEDMAN: Thank you, Jonathan. Good afternoon, and welcome to today's webinar on effective and efficient monitoring practices and review wrap-up. As Jonathan said, I'm Jennifer Friedman, the director of the Office of State Systems in Regions 1 Boston and Region 2 Philadelphia. I am really happy to welcome you, and thank you for joining us today.

As you know, this webinar is part of a series of training ETA is offering our state grantees on the subject of monitoring. The series was designed as a combination of prerecorded and live sessions, and today's live webinar is the third session we've offered.

Prior to today's session, we, one, held a session in April on communication and entrance meetings and, two, had a session in May on entrance meetings and conducting interviews.

In addition to the live sessions, in March and April we posted the following recorded webcast sessions on the monitoring page on WorkforceGPS, and we will provide that link at the end of our session today, in case you don't have it. We put posted sessions on the monitoring framework, preparing for monitoring, and conducting participant file reviews.

Also, proving that we are current with the times, we also posted a podcast on monitoring for governance.

As you can hopefully tell, we crafted a delivery and posting of our sessions to generally follow the timeline of a monitoring review. So in today's session, we will discuss the final steps of the monitoring process for the actual report writing, which we will discuss later this month with a podcast and a final live session discussing monitoring reports.

However, going back to today, we plan to briefly review a few tips to help you conduct efficient monitoring in which we will revisit planning and conducting in the reviews, and then will move into the priority topic for the session, wrapping up the monitoring review itself.

Thank you, again, for joining us today, and I'm really excited to introduce Mary Zmudczynski from Region 4 Dallas to lead just through our discussion today. So Mary?

MARY ZMUDCZYNSKI: Thank you, Jennifer, and good afternoon, everyone. As Jennifer said, I'm Mary Zmudczynski. I'm an accountant in the Division of Financial Management and Administrative Services in the Dallas Regional Office.

As Jennifer provided, during today's presentation, we will briefly review a few tips to help you conduct effective and efficient monitoring, and then we'll move into the primary topic of the session, which is wrapping up the monitoring.

Although there are many that we could share with you, the three tips for effective monitoring that we will discuss today are, number one, to use and follow an agenda, to check-in with their grantees at the end of the day, and to use review guides or tools.

The first step is to use and follow an agenda. Your agenda lifts and helps you track those activities that must be completed as part of your review. Your onsite workflow should be based on importance.

During this presentation, we all refer to areas where we have questions or have identified issues. We don't identify something as a finding until a written report is completed. So if you are aware of large issues beforehand or find a large issue on site, these must be followed until resolution. For this reason, your agenda should be flexible. Once your major tasks are completed, a review of your agenda will let you know where and when you may be able to add additional activity.

I've experienced that the entities we are reviewing tend to have items or activities that they would like to highlight during the review. This may be a tour of a new learning lab that's been set up or classroom training while it's in session. You want to be able to include time for these activities, if at all possible.

A draft agenda should be sent to the local area or subrecipient prior to the review. This makes them aware of possibility of the staff that you want to interview, the number of participants that you may want to interview, the employer or employer types that you may want to talk with, the training providers you want to talk with or visit, or the subrecipients that you would like to meet.

The agenda informs the local area who will be needed during the review and also allows them to be part of the planning process. Keep in mind that the locals have to ensure staff will be available, and they also have to schedule these meetings and visits around their various schedules, as well as any standing or prescheduled meetings that they may have.

As mentioned, your onsite workflow should be based on importance. If you are aware of large issues beforehand or find a large issue while on site, these must be followed until resolution.

So how is this accomplished? You have to determine who has or what is the best source of information for what you are trying to monitor. Is the issue on the program or fiscal side? If it's a program element, you probably want to start your discussion with the program director or manager. You start there to narrow down your questions.

Remember, the last presentation in the series discussed the use of open-ended questions. If the director or manager can't answer the question or elaborate on the issue, they will most likely refer you to another staff who can give you additional information.

Another strategy I like to use is to ask more than one person the same question. You are able to gain additional information from multiple perspectives. It's like following a trail of breadcrumbs. You follow the trail until you receive the information that responds to your question.

More important is that you want to make sure you can get rid of false issue. This allows you a more positive sense about the review and lets you move on to other areas of your agenda.

As a fiscal person, there have been many times that I've formulated in my head some major large issues prior to monitoring based on my review of the grantee's financial reports. Well, I found that reports don't tell the whole story. Once you're on site or at least having conversations with staff and are able to follow its processes and get a better picture of what's actually taking place, your initial questions will either be supported or dismissed.

You have to decide where you need to spend your time, based on what appears to be the biggest issues. You start broad and narrow into specific issues in order to identify the real cause or dismiss it altogether.

If you can, use this time to promote conversations or group discussions. Since everyone is in the same place, take advantage of this opportunity to talk together. Oftentimes, multiple staff or department representatives are required to find the source that answers your questions.

Many times, I've scheduled conversations with program and fiscal staff at the same time, especially if the issue started with the program activity but also included grant expenditures. This allows you to get a complete picture of the flow of activities and may eliminate some back and forth, which makes better use of your time. Once you feel that you have the information or documentation that adequately responds to your issue, you can move through the rest of your agenda.

The second strong practice to consider is holding an end of day check-in each day of the review to ensure clarity along the way. This practice provides the reviewer a chance to get needed information along the way rather than feeling overwhelmed at the end, and also provides the grantee with an opportunity to get an update on the review progress and feel confident that you are getting the whole picture of service delivery.

Schedule enough time to make the conversation valuable, but also be mindful of their time. Try not to keep them past their shift. Personally, I try to wrap up my day on site about 30 minutes prior to the end of the grantee's day so that they have time to complete other tasks at their desk not related to the review.

Discuss those areas where you have questions, identified issues, or may need corrective action. And, again, never identify something as a finding during the review because things may change in the official report.

I find it helpful to set their mind at ease. If I see an issue, I'll bring it to their attention. This gives them the chance to research it, understand the issue, and, frankly, digest it before the exit meeting. This also supports the recipient's ability to come to the exit conference with strategies in mind to resolve an issue.

The goal is to show total fairness. It is not a gotcha method. Sometimes issues can be resolved while you are on site. In that case of a compliance issue, the issue may still be written into the report, but it can be noted that it has already been corrected. These discussions also help in addressing and assessing a grant recipient's technical assistance needs to achieve success in its program goals and deliverables.

The check-in usually includes best practices and outstanding needs for documentation or discussion. If you need more information, let them know the last date you can accept new information. However, if you spent the entire day with them and many times this happens while touring classroom or work sites, an additional check-in may not be needed since the issues were most likely already identified as they were discovered.

OK. Next is the use of review guides. The state's monitoring guide or tool or ETA's core monitoring guide should be sent in advance of the review because it allows the local area subrecipient to know who will be needed and what is going to be reviewed. Doing a brief overview of the monitoring guide will allow the reviewer to cover the core activities and objectives with the grantee.

The reviewer should reiterate the purpose of the review, which is to evaluate the management and administration of the grant, the quality of the program and its services, and the performance of the grant to determine if the program is operating in compliance with the grant agreement and in a manner that ensures achievement of its goals and outcomes.

The guide provides a consistent framework that allows the reviewer to assess the compliance of the grant recipient in meeting the requirements outlined in its grant agreement, federal regulations, and the Uniform Guidance.

Review guides are helpful to keep you on track. It's like a checklist. So like using an agenda, you need to be flexible based on the situation in front of you. During some reviews, you will be able to cover every objective of every guide, and during other reviews, your time will be spent on those areas that support your largest issues or that are most important for that program.

Another use of regulations and a grand agreement is to use them to physically identify sections that speak to the grantee's question. Many times, we find that not all staff working on the grant program have copies or access to all information needed for effective grant management, such as the statement of work or terms and conditions of the grant.

Multiple times, I've been able to open my copy of the regs while I'm on site and point out the section or citation that either answers the grantee's question or supports a compliance issue that I have identified.

So now, we'll move on to wrapping up the review. In this section, we'll cover the importance of effective wrap-up, the wrap-up components, and then we'll move into group discussion.

So it may seem like wrapping up the monitoring work is a formality, but it's actually a critical component of the review process. It serves as a link between the face-to-face work with the grantee and the report, as well as any corrective actions or technical assistance that may be required post-review.

There are several key benefits of the wrap-up that supports a successful outcome of the review, which means that issues are identified, will be resolved, and the monitoring partnership between the state and local area is strengthened.

Those benefits include, first, an opportunity for the review team to organize, review results, and begin analysis. Next, allows the ability to resolve any outstanding questions or obtain needed clarification to support the team's post-review analysis and report writing, as well as providing the grantee with an opportunity to hear initial results and share additional information or documentation that might impact the review results.

So there are three main components of your wrap-up activities. These are gathering any remaining information needed and resolving questions, prepping for and conducting the exit meeting, and linking the onsite and post-review work. So next, we will talk about each of these activities.

So time between the completion of the onsite activities and the exit meeting is the opportunity for the review team to dot the I's and cross the T's. You will have gathered a lot of information and documentation throughout the review. Now is the time to review it all to check for gaps.

Good questions to ask might include, have I received all the documents I requested? Has the grantee fully responded to questions I raised throughout the review? And am I clear on all aspects of compliance, service design, and delivery? If the answer to any of these questions is no, then it's important to circle back with the grantee staff to get what you need.

Personally, I start this process by going through my notes around about the third evening of the review. That's assuming my review runs Monday through Friday. If there are items I've requested but I haven't received or additional items I need to request, I'm going to let the grantee know first thing the next day because that is usually the last day they have to provide information to allow me time to review it before the exit.

Again, let the grantee know the date by which they need to provide any additional information. The idea is that you want to go into the exit meeting with as much clarity as possible regarding program governance and implementation.

As discussed before, a strong practice to consider is holding an end of day check-in with the guarantee to ensure clarity along the way. This practice provides the reviewer a chance to get needed information along the way rather than feeling overwhelmed at the end.

It provides the grantee with an opportunity to get an update on the review progress and feel confident that you are getting the whole picture of service delivery. It ensures that the local area staff are not blindsided by any issues at the exit meeting, and it supports the recipient's ability to come to the exit meeting with strategies already in mind to resolve any issues.

So many states, in fact, have established a daily check-in meeting during onsite reviews to keep those being monitored abreast of how the review is proceeding. So at this time, if you have any check-in strategies that you'd like to share, please enter them into the chat.

MS. FRIEDMAN: Mary, this is Jennifer. I'm going to -- like you said, we're going to pause for a moment and see if anyone wants to enter some of your strategies in the chat to share with everybody.

MS. ZMUDCZYNSKI: Sure.

MS. FRIEDMAN: OK. Well, we don't have anything. So I will move on, and if we have anything, we can go back to it.

MS. ZMUDCZYNSKI: Perfect.

MS. FRIEDMAN: Actually, we do have something. We do have one that said they do Zoom check-in meetings with the providers to see if they need any additional assistance. I guess in day and age right now, we're doing a -- with working all from online workrooms and Zoom check-ins. And so that's good.

And we actually have a question too. It says, "Do you recommend allowing provider time to correct findings while on site?" going back to one of your earlier points that you made.

MS. ZMUDCZYNSKI: There may be a difference between allowing them extra time to correct the finding. Sometimes it's something minor that's easily corrected. And if it is corrected on site, if it's -- like talked about earlier, if it's an actual compliance issue, because it was found prior to being resolved, we still record it in the report, but we can say that it was resolved while we're on site.

But if it was something that was going to take them a while to resolve, then you're probably -- it may be additional documentation that they provide you once you've returned to your office, but how you handle that in putting it in your report will probably be determined by the -- I guess, the risk or the type of issue it was.

MS. FRIEDMAN: Great. Thank you. So we have a couple other suggestions. We have -- some people said they communicate via email throughout the day.

Another suggestion is the project manager compiles a daily status report for the grantee and is getting emailed to them at the end of the day.

MS. ZMUDCZYNSKI: Good idea.

MS. FRIEDMAN: And then -- yeah. I thought that was a really great idea. And then in Colorado, they allow local area staff access to the monitoring team to talk through identified issues. Another really great idea.

MS. ZMUDCZYNSKI: Oh, okay. More team discussions.

MS. FRIEDMAN: Yeah. Great.

MS. ZMUDCZYNSKI: And the last comment I like because, if you're emailing it to them, then they can read it at -- when they have time in between other activities that they're doing during the day, so it's not keeping them tied to just one specific time.

MS. FRIEDMAN: Right. And they say that -- and then they also added the majority of these issues are actually resolved through the team talk. So that sounds great. Great. Thank you for all your feedback.

Oh, we do have another question. See, once we open up the floodgates, here they come. Here you go, Mary. Another question. It says, "Do you suggest meeting with providers ahead of the review to answer questions or go over expectations of visit?"

MS. ZMUDCZYNSKI: I assume they're talking service providers.

MS. FRIEDMAN: I guess so.

MS. ZMUDCZYNSKI: Yeah. I would think, I mean, they could share the agenda. They could share that core monitoring guide with anybody who may be part of the review. So it kind of gives them an idea the questions that we may ask, the documents we may want to look at, because I know that our core guide includes questions as well as supports the compliance issues.

MS. FRIEDMAN: OK. And then we also have another comment that says, "We share real time document with identified issues," came in, and then one of the -- referring back to the Zoom calls, they call it technical assistance and tweaking issues rather than corrective action. They feel it's more gentle. That was another comment we received.

MS. ZMUDCZYNSKI: Right. And I think, too, I mean, sharing or having the conversations around issues that might already be identified or those you identify on site kind of helps with the resolution of them as well. I mean, so, you're already -- we talk about giving them as much information up front, being very clear with them. There's no surprises at the end. So a lot of times they've already formulated a resolution of these -- anything that would actually come out in the report of the findings. Good comments.

MS. FRIEDMAN: Yeah. Great comments. So I'll let you go on to exit meetings.

MS. ZMUDCZYNSKI: OK. One last question I saw in there, "When was the last time the core guide was updated?" Do you have that date, Jennifer? I don't have my guide --

MS. FRIEDMAN: I do not. So we'll have to look that up and get back. Yeah. Yeah.

MS. ZMUDCZYNSKI: I can reach here and find my guide. July of 2018.

MS. FRIEDMAN: There you go. July, 2018. I know we had some supplemental issued since the core guide as well.

MS. ZMUDCZYNSKI: Right.

MS. FRIEDMAN: We had the youth guide come out. We have national dislocated worker guide that came out as well.

MS. ZMUDCZYNSKI: Yeah. But it looks like the main core guide, the update came out in July of 2018.

MS. FRIEDMAN: Amazingly, at your fingertips. There you go.

MS. ZMUDCZYNSKI: Yeah. Just had to --

MS. FRIEDMAN: I just monitor for you. So okay.

MS. ZMUDCZYNSKI: You probably heard me shuffling a few papers, but yeah. I was able to find it. OK.

We'll move on to exit meeting basics. So the exit meeting is usually the last onsite activity of the monitoring review. It is the opportunity to provide preliminary results of the review to the grant recipient and to let them know about next steps, such as how the report will be constructed and the timeline for the response.

It is expected that the exit meeting is conducted in an open and transparent manner that supports reciprocal sharing of information as well as building trust. The exit is important to the monitoring partnership and, therefore, is best done in person to support relationship building.

However, there are times when it needs to be completed after the review team has returned home. This usually happens when critical grantee staff are not available on the last day or due to logistical reasons such as flight schedules.

In rare instances, additional time may be needed to complete the review or for the grantee to provide response or documentation, but that should be the exception. And I guess in this day of age of teleworking and more virtual meetings, when we say in person, I mean, sometimes your Zoom calls are the in person that we get today.

Ideally, the next meeting is attended by those who were engaged in the review. Typically, there is a program and fiscal review being conducted at the same time. A program director and a finance director, CFO, or other fiscal agent will be in attendance. Oftentimes, the head of the agency organization attends the exit meeting as well as subrecipients, service providers, or key WIOA partners.

It is important to have staff at the table who are responsible for initiating any required changes that ultimately lead to the resolution of any reported findings. The key players who identified technical assistance needs during the monitoring visit are also encouraged to attend.

OK. Thorough preparation is very important to ensure the successful exit meeting in which all attendees understand the outcome of the review, agree on its accuracy, and are clear on next steps.

Some things to consider when preparing our, first, scheduling. It's best to include the exit meeting as a review activity in the initial communication with the grantee and try to schedule it at least tentatively up front. The time may need to change, so be as flexible as possible while meeting the needs of both the grantee and the review team. Some considerations are the grantee staff schedules, as well as reviewer's travel needs.

Next, the review team needs to go into the exit meeting in agreement with any issues, areas of concern, and best practices that they've identified during the review. Ideally, the review team is meeting at the end of each day to review their initial findings or areas of concern and probing deeper were needed. Those daily check-ins allow the team to connect any dots across programs or program and fiscal issues.

For example, a reviewer on the program side may note that very few participants are entering classroom-based training program, yet the fiscal review shows an increase in ITA expenditures. While there may be a reasonable explanation for this, that is a red flag to explore. The team should work together to ensure that all of the review results are organized in a logical way for the exit and can be communicated clearly.

In addition, the review team may prepare the review agenda that is ideally shared with the grantee prior to the meeting. The agenda ensures all are on the same page and know what to expect, as well as their roles and responsibilities.

Finally, the review team may want to hold a dry run or walk through of each of their sections on the agenda so that the full team is aware of issues and can provide constructive feedback. This will ensure that the issues are presented clearly to the grantee.

The team should also be in alignment around the next steps, including when the grantee should expect to receive the written report and the timeframe for their required response.

Again, if you have any strategies for preparing for an exit meeting that you'd like to share, we'll pause here, and you can enter them into the chat.

MS. FRIEDMAN: Thanks, Mary. While everyone's entering in the chat, we do have another comment about the previous pause, and it says something about, "The severity of the actions and the monitoring reports depend largely on what the monitor sees on the visit and when I -- what they saw with the previous monitoring report. If they discover that a grantee is still incurring the same issues as the previous year's monitoring, they would be more stern to possibly give corrective action to call their attention. If this is a first-time situation where noncompliance is happening, maybe more soft."

So I guess they're saying depends on what's going on. Is it a repetitive issue? Is it severity of the issue? That's how they approach it, to answer our earlier question.

MS. ZMUDCZYNSKI: Correct. We usually tend to, A, look at prior monitoring reports that were the result of the reports from the past. That's why we look at the entity's single audit reports as well, to see if there were any things in their single audit that may bear weight on the monitoring visit that you're planning to go do.

So definitely, if it's a repeat offense, you definitely have to, I think, dig a little deeper to find what's causing it and really be stronger in your corrective action required in order to try to resolve the finding of the issue.

I see another question, Jennifer. "When did the national DWG guide come out?" Is that the supplement they're asking about?"

MS. FRIEDMAN: Yeah. That was recently. Very recently.

MS. ZMUDCZYNSKI: Yeah. I don't have that date, though. And so maybe we can --

MS. FRIEDMAN: Yeah. That's -- yeah.

So are there any suggestions we have? Any strategies that everyone does for preparing for the exit meeting you want to share?

While waiting for that, there's a question that came in for you, Mary. It says, "Do you use a routine monitoring visit to validate the previous year's findings?"

I would say I don't know what you really mean by validate or is it checking up on or -- because a lot of time -- and I'll put it to you too, but we use the current monitoring to check up on the corrective action that the grantee may have taken from the previous findings to see they really have implemented that corrective action. So I just writing up, say, hey, we do this as a way to check up on it. Do you do the same?

MS. ZMUDCZYNSKI: Right. Yeah. I wouldn't say -- I wouldn't say you're validating prior years because you -- you've already identified those and written them up in the report. But, definitely, go back and make sure that they've -- they're still implementing the corrective action.

In fact, I had a -- I have a grantee who has -- because my -- one of my many hats that I wear, we're monitoring not only the formula funds, but we're also monitoring discretionary grants. We have a grantee who actually has two different types of discretionary grants.

And so, I reviewed them under one program and worked with them through resolution or corrective action for their findings. And when I went out on site to do the second review with a different program but a lot of those same systemic accounting procedure issues, and I really wanted to make sure that the corrective actions that they -- they truly put them in place, what -- how they identified new processes, what they were going to do moving forward after my first review.

So you definitely -- one monitoring visit from year to year builds on the prior.

MS. FRIEDMAN: Exactly. And they did provide that clarification, that they're follow up on validating implementation of corrective action, which is what we thought. So that was great.

MS. ZMUDCZYNSKI: Exactly. Yeah.

MS. FRIEDMAN: Another suggestion was given. It was -- hopefully, I'm saying this correctly -- "Trello is also a great tool used for monitors. They use it to track questions as they come across them, keeping track of past progress from outlined agendas. Super helpful for keeping things from falling through the cracks in the exit."

So thank you for that comment, and that's a tool that a colleague is using.

And then here it says, "The best exit meeting will take place if the grantee has been kept in the loop throughout the monitoring and no surprises take place."

And I think you said that several times, Mary. So I think you definitely -- I agree with that. I think you do, too, because you said it, and I'm taking your word for it.

Here we have in Colorado, "We follow the steps outlined in this slide." So there you go. "Additionally, members of the management help the monitoring team ensure that we are prepared for the smooth exit meeting." So they follow your side. There you go.

"For exit, use Tool T and Tool U from CMG to help organize all observations."

I feel like -- I don't know about you, Mary. I love talking Tool T and Tool U. I feel like I'm a walking commercial for those two tools. So for those who have not seen them in the core monitoring guide, I strongly suggest you use them. They are great organization tools. They're great when you have that pre-meeting that you talked about, that dry run through or debrief that you mentioned. Those are great tools. I don't know. Do you use them a lot, Mary, because I think they're very useful?

MS. ZMUDCZYNSKI: Yeah. We use those as well as the -- I'm not sure the tool alphabet but the one that helps you to write your finding because, of course, to reach the level of finding, it has to be a compliance issue. And so, I think the tool helps you work through probably leading up to the four Cs that we're going to do additional training on later this month, what you saw, what you think caused it, you look for your citation or condition citation, and then what it's going to take for them to resolve or correct that

MS. FRIEDMAN: I think that's resource H, if I recall. But that's definitely a great one, too. So those tools and those resources at the end of CMG [inaudible] I think they're excellent.

We have another comment. It says, "For exits, I recap all my issues, potential findings with the grantee either via meeting or a detailed email. I will highlight the major issues discovered in both program and fiscal administration, if any, propose ways to come back into compliance, and give the grantee a specific timeframe to respond, fix the issues. At the expiration of that time, I write my report and any outstanding issues as mentioned, either as an area of concern or corrective action, depending on the situation."

So they want to know if I meant pull you. I meant Tool U. If I said pull you, Tool U. And so, that's the tool that we were talking about. So excuse me if I wasn't clear enough.

And the question was, "What tool do you use for monitoring?"

MS. ZMUDCZYNSKI: That would be the entire -- the core monitoring guide.

MS. FRIEDMAN: And then, "Please share the name of the tools again." Tool T as in Tom, Tool U as in umbrella, and I believe you were mentioning resource H. I think that's what it was that you were describing. They're all in the back of the core monitoring guide.

All right. I think we covered all that. So next is, I think, your exit meeting components.

MS. ZMUDCZYNSKI: All right. So we just mentioned preparing for an agenda for the exit meeting. The agenda will help keep you on track in case of a long discussion on any of the topics. The following items are typically including in the exit meeting.

So first, you want to definitely thank the local areas or subrecipient for their time and engagement in the review. Our many requests take up a lot of their time during the review, and this may cause them to work extra hours to catch up on other tasks.

Next, you remind them of the scope of activities conducted during the review, including including use of the core monitoring guide as well as other regulations and guidance.

Most important is that you share the issues, concerns, and best practices. And a tip that I use that kind of -- you may want to start with the positive feedback or best practices, and it can set the tone for collaboration and that we are working towards the same goal.

So you may include a discussion of potential corrective action and the impact on the program, if issues are not addressed. Remember to also include a discussion of the provision of technical assistance, if needed or requested.

And last, you should remind them of the process for issue resolution and reports. Let the grantee know that any findings identified in the report will follow the four Cs format that will be discussed in a few minutes. The report will include the corrective actions that must be taken for resolution, and let them know that they are not left stranded while responding. Our goal is to work with them to resolve any identified issues and improve their outcomes.

We really stress this when we're in our exit meeting because we kind of sit around the table, and here we are giving them X, Y, Z, one, two, three of our review. And they just kind of -- sometimes they're overwhelmed or -- although they've heard of the issues or concerns ahead of time of being overwhelmed when it's just laid out in front of them. And it's like, we're going to work with you side by side to find resolution to the issues.

So it's not like we're just going to list them and walk away. No. We're going to give you all of the information that you need in order to do the resolution or correct it -- the finding. We even include citation to kind of back up source of what we've identified and then work with them through resolution.

MS. FRIEDMAN: So Mary, there's a question about, "How do you address the subrecipient not having key staff available available during the review? What do you do when that happens?"

MS. ZMUDCZYNSKI: Well, I mean, we've had -- you could do -- what's the term -- kind of like a hybrid meeting. I mean, you can have certain people in person. We've had teams that were -- if your subrecipient's in another city -- I mean, sometimes we're in the state office and we visited a subrecipient in another town. They could be on the phone. You can either do a video conference with them or have them on the phone.

Ideally, I mean, you try to have everybody hearing the message at the same time. If that can't happen, which is rare, but that is where, if they're -- truly, if it's a very important partner or if they're one of the main players in maybe one of your larger issues that may hit the report, then you may want to schedule it at a time when they are available.

MS. FRIEDMAN: OK. Great. There's some questions also about getting links to the supplements, which we can provide later on or where they are. We can certainly make sure that they are available on our monitoring page. So we can -- we need to check back on the monitoring page. We'll make sure we have those links up there for all the core monitoring guide itself and also the supplements. We'll add that to our page to help it out for everybody.

MS. ZMUDCZYNSKI: Great.

MS. FRIEDMAN: So I'm going to go to the next slide for you.

MS. ZMUDCZYNSKI: OK.

MS. FRIEDMAN: All right.

MS. ZMUDCZYNSKI: OK. You probably already know, but just to remind you, the exit meeting is not intended to be an off-the-cuff casual conversation. The results of the review are typically very important to the grantee. Their leadership may see it as a measure of how well they're doing their job. It's important to all parties that the results of the review are accurate, understood, and clear next steps are identified.

To accomplish those things and support the review grantee relationship, the following considerations are important when conducting the exit meeting. First -- I know this isn't the first time we've said it, but no blindsiding. We have already discussed this, but it's worth re-mentioning. The grantee should already have an idea of any issues you've identified because of your questions and your daily check-ins. By sharing this information in advance, it also helps them to come to the exit meeting with ideas or potential next steps to resolve the issue.

Next, ensure sufficient time to clearly share and discuss results of the review and respond to any grantee questions or concerns, but this is not the time to do a deep dive into processes or solidify resolution.

You also want to frame identified issues as compliance violations and/or quality issues rather than findings, and the review team, along with their leadership, may need to conduct further analysis and discuss if something will ultimately be elevated to a finding or strong area of concern in the report. After all, different people may have different interpretation of the situation, and the grantee may also be able to provide further information or documentation which results are concerned.

That said, if you are confident that something will at least be an area of concern, it is helpful to outline how a grantee could correct the issue. For example, if case notes are lacking and there's not a clear policy on required depth and frequency, the corrective action may be the establishment of a clear policy, training on it for staff, and accountability built into case manager performance standards.

But also include identifying and referencing source documentation. If you have identified compliance issues as part of the review work, then you need to be able to cite the law, regulation, or policy that outlines the requirement that was not met.

Personally, I do this for each of the issues I discuss during an exit meeting. It not only supports my compliance issues, but it usually becomes a draft from our report. So I feel like I'm killing two birds with one stone.

Include the provision of technical assistance on site and/or post-review. If possible, come into the exit meeting with strategies for resolving issues or an offer to provide technical assistance going forward to support issue resolution. Just like providing technical assistance and training is part of ETA's responsibility and role in the monitoring partnership, it is also a responsibility of the state to the local system.

Last, always end by asking if there are any questions to ensure everyone walks away with a complete understanding of the results of the review.

Again, if you have any exit meeting strategies that you'd like to share, we'll take a pause, and enter them into the chat.

MS. FRIEDMAN: Mary, while we wait for that, I'm going to throw you a question which I didn't let you know ahead of time. So I do apologize, but you mentioned it before. We all are doing these reviews right now at our desk. So do you have any strategies that you've been using since we've been doing because we've been not in the office or not going on site for reviews, for exit meetings?

MS. ZMUDCZYNSKI: We've been holding Zoom. Of course, our preferred system that we're using is Microsoft Teams, and so we have been conducting our entrance meetings and exit meetings through Teams.

So we put out the invitation to everybody that we would -- we invite to be there, just like we would on site. And so --- and we have our exit meeting -- entrance meeting, rather, is a Monday morning, and then we conclude usually a Friday morning or afternoon with our exit meetings.

Again, we have periodic Teams meetings during the review. We may do -- conduct our interviews via Teams meeting because we do have the questions through the core guide that we're expected to go through and answer while we're conducting a review. So we do those meetings with the staff that we feel will -- are able to answer our questions. We do it through Teams. We email back and forth, especially when we're requesting additional documentation. So between email and then we have a Teams call as our exit.

MS. FRIEDMAN: And do you find that more people are attending because you have Teams? And sometimes when you're on site, you have limited maybe available for space for people who are there or traveling. Are you finding -- because we found some more people because we have more people available -- I mean, more availability through Teams, more people are showing up for these meetings. Have you found that, too?

MS. ZMUDCZYNSKI: I have. I have. I think one of our -- we did a state level -- we're doing the unemployment insurance reviews currently, and I believe it was one of the secretaries actually attended one of our exit meetings because, of course, if he was at home, you're less -- I think sometimes you're almost able to work with people's time better and schedule something electronically that meets the needs of more people.

MS. FRIEDMAN: Great. Well, I'm going to let you move on to the four Cs now. So here you go.

MS. ZMUDCZYNSKI: All right. The four Cs. So in following ETA's core monitoring guide, there are four components of a finding. The first is condition. So this is, what is the specific problem or violation? This is something that is out of compliance with law, regulation, guide, or policy.

Next is cause. What is causing the condition to occur? For example, if the grantee is underreporting expenditures, you could have a conversation with the finance person or the person that fills out the ETA 9130 on a quarterly basis, but they're usually filling in the report due to the data that they're able to pull out of the system that may not give you the actual cause.

So the actual cause may be that they aren't able to enroll enough participants to date in order to expend the funds on training. So this is where going back to some of the conversations you have with multiple people from different departments, but you do want to get to the actual, what is causing the condition?

Then we provide criteria. This is what standard or requirement, which is a citation that is being used to evaluate the condition. So this is where we would cite law or regulation.

And last is the corrective action. So what action must be taken by the grantee to resolve the finding?

So all these components are good to keep in mind when identifying issues on site. You will need to understand each of the Cs in order to effectively outline the finding in the written report. You may have already identified an issue that will likely become a finding, but if you don't yet know the underlying cause of the issue, you need to continue probing. The four Cs will be covered in depth later this month as part of the post-onsite review work.

MS. FRIEDMAN: Great. Thank you. Mary, we have a question for you. I'm going back to before you even get to the four Cs, but when you're still working -- getting ready for your exit, is how do you handle, if you're still going through materials the grantee has provided at the time of the exit conference?

MS. ZMUDCZYNSKI: I think you've identified your issue. You let them know what you're seeing. Sometimes you have to ask them, of course, help me understand what I'm seeing. Can you provide me additional information?

So even if it's a tentative issue that you've identified it while on site, even if you're allowing them to provide you additional documentation, I think it has to still be discussed during the exit and framed in that way.

And then it really depends on, I think, the level of the issue whether you want to allow them additional time, especially while you're traveling. You may give them until the end of that day to -- or first thing Monday or give them -- you have to give them a timeframe by which they can provide you additional documentation because you have to cut it off at some point in order for you to be able to go back to the office.

You gather all your information. We usually have to brief our supervisor. Sometimes there's a team briefing, if you're doing program and fiscal. So I mean, the review has to be cut off at a certain point so that you can have these conversations internally and then get to writing your report because you're on a timeframe too to write your report, get it reviewed, get it to the grantee.

MS. FRIEDMAN: Great. Thank you. OK. We have another one. It says, "Is it correct that an area of concern is something that has the potential to become a finding in the future. So area of concern has to be tied to a violation of federal regulation, or would you say that is correct or not?"

And I would say here -- I would say here is a federal regulation. But remember, these are state grantees. So it could be a state regulation or a state policy as well.

MS. ZMUDCZYNSKI: Right. It could be a state policy. Yes. It could be something that borders on -- could become a violation. I'm trying to think of one of mine. I think I found -- this goes back to when -- so, the Uniform Guidance came out and took effect with grants that were awarded on or after December 26, 2014.

And so, any monitoring reviews we did after that, the grantees were expected and we put out TEGLs -- they had to go and update the policies and procedures and they had to use the Uniform Guidance for any of their citation references, or they couldn't reference any of the old circulars that were published that the Uniform Guidance replaced.

And so, some of these were areas of concern. I think they didn't rise to a finding in a way -- it depends on -- if they allowed it to stay and if this was something that they published further or tried to enforce on their subrecipients, then it ultimately kind of would have snowballed, and it could have found its way -- it could have reached a level of finding. So in some of those instances, we did an area of concern. But if they weren't addressed, they could have easily risen to a finding.

MS. FRIEDMAN: OK. Thank you. And then here's one. It says, "Is there room in the review to provide technical assistance or suggestions for improvement? These are things that wouldn't necessarily be compliance wise, however, make the program run more efficiently that we'd like the grantee to consider."

And I would just say before turning over to you is that these -- your monitoring reports, each state or local area has the monitoring reports their way they want to present it. That's up to you. So that would be -- if that's how your state or your local area wants to proceed, that would be a suggestion for you to do. We're just trying to give you how we -- what we do in our reports. And we don't do that in our reports, but that could be a format you want to use in your reports.

Mary, do you have anything else to say about that suggestion?

MS. ZMUDCZYNSKI: I would agree. I mean, as long as the basics are covered or if they want to add an additional section to their report to include technical assistance, it almost sounds like some of these things -- I guess it wouldn't be an area of concern. It would be a best practice. So if they wanted to -- if it was part of their policy or if they wanted to make it part of their policy or just decide to include another section that talked about technical assistance, I think it's totally up to them.

MS. FRIEDMAN: So I'll just let you know, sometimes what we've done in the past in Regions 1 and 2 is we haven't put it in the report, but we actually have a conversation. Even after our exit, we say, hey, we've also noticed these areas or those debriefs that Mary talked about every day. Hey, also let me give you some technical assistance on these areas. And so those daily conversations you're having, those check-ins, you mention that and providing technical assistance. There's other opportunities as well.

MS. ZMUDCZYNSKI: Yeah. And it could be -- it seems like if it's technical assistance, it would need to be bigger and maybe more in-person conversations or at least a Teams meeting and maybe something that would take longer, especially if -- if we identify that somebody needs technical assistance maybe on one of the sections of the Uniform Guidance, then we're going to set up a time to go over either that presentation, the SMART presentation, or we're going to identify and maybe go side by side through the electronic version on WorkforceGPS.

But it seems like it would be a separate conversation maybe mentioned in the report, but I think the actual technical assistance would take place outside of the report.

MS. FRIEDMAN: Great. Thank you. So I just wanted to [inaudible].

MS. ZMUDCZYNSKI: That's okay.

MS. FRIEDMAN: I don't see any other questions come in. We'll hang on for a few more minutes. I want to -- I mentioned earlier we have -- we've had these previous webinars, webcasts, and podcast we've been posting. So this is the page, and this is the actual link to it to go on there. They're always available for you.

People have asked questions about getting links to the core monitoring guide. So I will work with our staff to get those linked on there as well. It's an easier place to go to if you're going for monitoring items to go there as well to get those links. And that will be very helpful.

We have -- as Mary alluded to, we have the four Cs. We have two sessions coming up for the four Cs. We're having a podcast, which is an over -- a little bit general overview of the four Cs, and then we have a deep dive on the 23rd. I think the page really says coming July, but we've bumped it up a couple weeks early so people can get that information sooner versus later. And it's a deep dive. We're going to talk about each of the four Cs themselves. And the staff -- once again, this is Mary who's involved in monitoring. It's really a couple federal public officers who do the monitoring and really work with the four Cs and work with the grantees on it, really discussing them a little bit deeper. So that's what we have.

So thank you. Mary, do you have any other pearls of wisdom you want to impart with everyone today?

MS. ZMUDCZYNSKI: No. I appreciate everybody's comments. We had some really good comments and questions and just were able to identify some really good practices that people are utilizing out there in order to do our due diligence in annual monitoring.

MS. FRIEDMAN: Yes. Great. Thank you for all that feedback and suggestions, and these are great peer learning sessions as well.

So with that said, I'm going to say goodbye and thank you, Mary, for all your ideas and helpful suggestions and experiences -- sharing your experiences with us.

MS. ZMUDCZYNSKI: You're welcome. Have a great afternoon, everyone.

MS. FRIEDMAN: Thank you, everybody.

(END)