

## PERTINENT CHANGES IN REVIEW PROCESS

1. DOTR will call and talk to Director of the WBC, letter to be sent to WBC advising review date and enclosing the appropriate WBC Review Checklist to be filled out and returned to DOTR before visit.
2. Sampling of client files, training files and financial transaction documentation and items of concerned brought about by the WBC Checklist.
3. WBC Grant Monitoring Statement to be prepared by DOTR after reviewing checklist and on site review of files, etc.
4. OWBO will sign off on Monitoring Statement and if necessary prepare Cure Letter to WBC and copy DOTR.
5. NO NEED TO APPROVE EACH BROCHURE BEFORE PRINTING.
6. Each review focuses on different program areas.

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## TIMELINE FOR WBC AND DOTR

October 1st	WBC Can Request Advance for 1st Quarter
January 1st	WBC Can Request Advance for 2 <sup>nd</sup> quarter
On or Before February 15th	The WBC must send in their forms and worksheets for reconciliation of the first quarter. This includes a 272, which is submitted electronically to HHS and concurrently to OWBO, in addition to sending OWBO hard copies of their budget worksheets, forms 269, and 270 as well as the quarterly narrative report.
February 1 <sup>st</sup>	DOTR calls the WBC to work out date of review
February 15 <sup>th</sup>	DOTR sends out letter along with WBC Semi-annual Review Checklist to the Director of the WBC
By March 1 <sup>st</sup>	WBC returns checklist to DOTR prior to March 1 <sup>st</sup>
By March 1- 15	Conduct Semi-Annual WBC Review, See Checklist
March 15 <sup>th</sup>	WBC Review and DOTR Monitoring Statement must be completed and received by OWBO
On or Before May 15	The WBC must send in their forms and worksheets for reconciliation of the second quarter. This includes a 272, which is submitted electronically to HHS and concurrently to OWBO, in addition to sending OWBO hard copies of their budget worksheets, forms 269, and 270 as well as the quarterly narrative report..WBC may request their 3rd quarter advance only after notification from OWBO that their 2nd quarter has reconciled
July 1st	DOTR calls the WBC to work out date of review.
July 1-15	DOTR sends out letter along with WBC Final Review Checklist to the Director of the WBC
By August 1 <sup>st</sup>	WBC submits checklist to DOTR prior to August 1st
On or Before August 15 <sup>th</sup>	The WBC must send in their forms and worksheets for reconciliation of the third quarter. This includes a 272, which is submitted electronically to HHS and concurrently to OWBO, in addition to sending OWBO hard copies of their budget worksheets, forms 269, and 270 as well as the quarterly narrative report.
August 1 <sup>st</sup> -15 <sup>TH</sup>	Conduct Annual WBC Review

August 15<sup>th</sup>

WBC Review and DOTR Monitoring Statement must be completed and received by OWBO

After September 29<sup>th</sup>

WBC Requests 4<sup>th</sup> Quarter Reimbursement within 45 days to OWBO, send form 272 to HHS; fourth quarter

Revision VIII – 6/16/08

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## **District Office Technical Representatives Responsibilities**

### **A** Liaison

- Primary contact and liaison between the WBC, OWBO, and other SBA local resources
- Integrate the WBC into the SBA network of service providers and resource partners, and encourage collaboration
- Participate in periodic OWBO/WBC/DOTR conference calls
- Include WBC in district office events and refer clients to the WBC
- Make documentation/information available to DD, RA

### **B** Oversight Manager/Advisor

- Understand Notice of Award
- Maintain a file for each WBC, within your purview, by year. File in sections, Budget w/modifications, financial forms, correspondence, quarterly narratives and Site visits. DOTRs should ensure that the file for the WBC can be accessed by other employees in the office.
- Oversee WBC activities and operations

Look for project revisions (changes in scope, contractual arrangements, carryover, etc.), and personnel changes. Bring any issues to OWBO's attention. Monitor compliance (match certification, program income, use of funds, etc.) Ensure that WBC submits timely data reports and that data collected complies with SBA definitions.

- Conduct two site visits: one mid year and one annual WBC Review for the current year's grant. The mid year which consists of review by DOTR with Monitoring Statement and must be completed and received in OWBO by March 15th with original signatures. The year end will consist of WBC Review Checklist, Monitoring Statement from DOTR, and must be completed and received in OWBO by August 15<sup>th</sup>. The examinations must take place at the records and operations center(s) of the WBC. A justification for waiver of the site visit must be submitted to the Director of OWBO for consideration/approval.
- The field visit report should have a narrative Monitoring Statement addressing each item on the review checklist. It need not be lengthy but it must be complete. The DOTR will use these to follow up on corrective actions and monitor progress over time. The DOTR is also responsible for sharing these reports with Director of the WBC. Reports should be maintained in your District Office WBC files for as long as necessary to properly manage the monitoring process. They may also be requested during OWBO field visits and Headquarter Quality Service Reviews.

**Programmatic Reviews must include:**

- A random sampling of training files (approximately 12 or more), verify that files have SBA Form 888, Registration forms or sign in sheets, attendee fees, evaluation forms, copy of brochure w/logo and disclaimers. (Program income should be listed on the 888s) Verify, where appropriate, that SBA is recognized by logo and disclaimer on marketing and all other promotional materials, including the WBC website.
- A random sampling of counseling files (approximately 12 or more and should include face to face, on-line, and telephone counseling). Verify that files are complete and counseling narratives are sufficiently substantial to support continuity. i.e. Another counselor should be able to read the narratives and continue counseling. Each file should contain an SBA Form 641 signed by client, narrative of counseling visit, marketing material, or any other documentation that is being worked on, such as Business Plan, Brochures, Marketing Plan, etc. DOTR should include telephone calls to clients as well.
- Verify that the WBC has adequate policies and procedures in place to monitor the receipt and expenditure of program income and ensuring that program income was used—
  - to waive tuition or other fees for project participation of economically and socially disadvantaged clients;
  - for reasonable costs related to the WBC Program with written approval of the grants officer;
  - for continuation of program activities following exhaustion of the grant funds after the end of the budget period.

**Financial Reviews must include but are not limited to review of the following areas:**

- Verification of Cash Match – Copies of Checks, deposits to account, letters, etc. showing Cash Match and other Match
- Review of Chart of Accounts, Federal, Non-Federal, Program Income, In-kind. Randomly pick transactions from Ledger including review of payroll and review payment procedure and invoices, follow timesheet to Ledger. Include conversation on what the SBA is looking for and how the Finance Department is handling WBC accounting system.
- If the DOTR sees any irregularities it is their direct responsibility to report the information to his/her District Director, then to OWBO for appropriate action. Irregularities may include misrepresentation, fraud, or violations of federal, state or local laws in connection with a transaction involving a WBC officer, employee, agent, consultant, or volunteer or non-compliance with the terms and conditions of the grant.

Version VIII– 6/16/08

Letter or E-mail to be Sent to WBC Contact  
Call and set date before letter goes out.

Date:

To:

RE: (Semi-annual or Annual) WBC Review

Dear:

As the District Office Technical Representative for the (WBC), I will be conducting the above review on date. This review will include a review of training, counseling and financial records.

Please don't hesitate to contact me at the number below if you should have any questions.

Sincerely,

DOTR

Version VIII – 6/16/08

**MID YEAR WBC REVIEW CHECKLIST**  
**Attach additional pages with responses if necessary**

**.The primary purpose of the mid year review is to:**

- 1) **To ensure that key personnel are in place**
- 2) **To ensure that an adequate accounting system is in place that separates sources and uses of funds (i.e. federal cash, local cash, in-kind). Verify that the WBC has adequate policies and procedures in place to monitor the receipt and expenditure of program income and ensuring that program income was used---**
  - **To waive tuition or other fees for project participation of economically and socially disadvantaged clients**
  - **For reasonable costs related to the WBC Program with written approval of the grants officer;**
  - **For continuation of program activities following exhaustion of the grant funds after the end of the budget period**
- 3) **Chart of accounts to ensure logo and brand placement**
- 4) **To ensure that they are on pace to achieve annual milestones. Note if any barriers**
- 5) **Are counseling and training files established and maintained correctly**
- 6) **Is cash match in place?**

**Program Compliance/Adherence to the NOA**

1. Is the SBA logo prominently displayed?
2. Do all of your WBC materials, brochures, including your website, acknowledge the SBA partnership with the SBA logo and the following language attached “Funded in part by a Cooperative Agreement with the U. S. Small Business Administration”. Do they contain other disclaimers as well?
3. Does the WBC maintain a working relationship with the District Director and the District Office Technical Representative (DOTR) in the nearest SBA District Office, and provide support for their outreach efforts to women. Document the way your organization executes your original plan to:
  - use the SBA as a resource partner and maintain communication with the DOTR;
  - participate with the SBA in conferences and special programs for women;
  - include the SBA in outreach activities and events;
  - promote SBA programs to the WBC’s clients;
4. On your website, is the information accurate and current, such as staff, center location, telephone number, etc?

**B. Management**

1. Is there a full-time WBC Executive Director/WBC Program Director who is responsible for the day to day operation of the WBC?
2. Have there been any changes to the NOA?

3. Do you maintain an updated Standard Operating Procedure Manual?
4. Provide a listing of all current employees of the WBC with the following information:

Name	Job Title	% of Time Spent Working on WBC
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**C. Reporting**

1. Are your reports submitted to Washington on a timely basis?
2. Are there systems in place to ensure valid data collection and that the data is verified through systematic monitoring?

**D. Financial Integrity**

1. As the Director of the Women’s Business Center, do you have control of all program resources, including control of the program budget, under the center’s control?
2. Do you have organizational and operational functions in place that provide you with assurances that all funds are adequately accounted for and recorded?
3. Are there any recommendations/findings that were found during the last site visit or financial review?
4. Are all program income funds properly accounted for and invested back in the WBC program?
5. Provide a list of all program income from sources other than training.
6. Have you received match funds (non-federal, in-kind and program income)?
7. Are the WBC Financial records in the financial system maintained separately from the financial records of other projects conducted by the recipient and are maintained separately by grant budget year? Please submit chart of accounts.
9. Do **all** checks and other financial transactions get signed by at least two employees, one of which must be the WBC program director?

**CERTIFICATION**

I certify that the responses and information provided on this review are accurate and correct to the best of my knowledge.

WBC Name  
Executive Director/Program Director



Signature and Date

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Version VIII – 6/16/08

**YEAR END WBC REVIEW CHECKLIST**  
**Attach additional pages with responses if necessary**

- A random sampling of training files (approximately 12 or more), verify that files have SBA form 888. Registration forms or sign-in sheets, attendee fees, evaluation forms, copy of brochure w/logo and disclaimers. (Program income should be listed on the 888s) Verify, where appropriate, that SBA is recognized by logo and disclaimer on marketing and all other promotional materials, including the WBC website.
- A random sampling of counseling files (approximately 12 or more and should include face to face, on-line, and telephone counseling). Verify that files are complete and counseling narratives are sufficiently substantial to support continuity, i.e. Another counselor should be able to read the narratives and continue counseling. Each file should contain an SBA Form 641 signed by client, narrative of counseling visit, marketing material, or any other documentation that is being worked on, such as Business Plan, Brochures, Marketing Plan, etc. DOTR should include telephone calls to clients as well.

**The purpose of the year end review is to:**

- 1) Evaluate appropriate spending and eligibility (testing transactions)
- 2) Ensure the key personnel are in place (focus on change in employees)
- 3) Ensure that they are on pace to achieve milestones
- 4) Is match being spent?
- 5) Random sampling of filesA

**D. Financial Integrity**

5. As the Director of the Women's Business Center, do you personally have control of all program resources under the center's control?
6. Do you have organizational and operational functions in place that provide you with assurances that all funds are adequately accounted for and recorded?
7. Have any recommendations/findings that were found during the last financial examination pertaining to the WBC been rectified? (Attach letters, etc.)
8. Are all program income funds, to the best of your knowledge, properly accounted for and deposited promptly?
5. Provide a list of all program income from sources other than training.
6. Have you received match funds (non-federal, in-kind and program income)?

Please List Year to Date WBC Cash and In-Kind Match Obtained and Spent (This must include the

entire non-federal amount on the approved budget)

FUNDING SOURCE CASH IN-KIND PROGRAM INCOME SPENT FOR WBC

7. Is there a variance of more than 10% between actual expenditures and the approved budget?

8. Provide a list of Contractors used, amount and purpose of Contract?

9. Please provide the following for all federal grants you have received?

Agency	Amount	Work Needed for Performance
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**CERTIFICATION**

I certify that the responses and information provided on this review are accurate and correct to the best of my knowledge.

WBC Name  
Executive Director/Program Director

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Signature and Date

Version VIII – 6/16/08

# WBC GRANT MONITORING STATEMENT

WBC: \_\_\_\_\_ GRANT NO. \_\_\_\_\_

I. MONITORING ACTION PERFORMED i.e. – Review of financial and programmatic review, review of progress report, review of program income etc., for the period

\_\_\_\_\_ - \_\_\_\_\_

II. FINDINGS

III. RECOMMENDED ACTIONS

\_\_\_\_\_  
DOTR SIGNATURE AND DATE

IV. ACTIONS TAKEN BY OWBO

(SEE CURE LETTER)

\_\_\_\_\_  
OWBO SIGNATURE AND DATE

Revision VIII – 6/16/08



# SAMPLE ONE

## WBC GRANT MONITORING STATEMENT

WBC: \_\_\_\_\_ GRANT NO. \_\_\_\_\_

Period Reviewed: October 1, 2008 to February 28, 2009

### MONITORING ACTION

This examination was conducted by Sandy, DOTR along with Lorna, BDS and backup DOTR.

Review of the Semi-Annual WBC Review Checklist showed only one item to be reviewed by me in more detail. A finding from the Final Review last year was found and rectified. Employees remain the same along with time spent working on the WBC. Also cash match funds were received and spent. Copies of the checks are attached.

The programmatic part of this review was conducted at the Women's Business Center with Tonya, Director of the WBC and Karen, with the recipient organization and the financial part was conducted at the offices of MyWBC, office of grant recipient with Donnell and Denise.

For the programmatic part we reviewed random training files and counseling files. The financial part consisted of random review of transactions from ledgers.

In client files we looked for LMI information, intake forms, write-ups and impact data, along with pertinent documents such as business plans, marketing plans, loan information, client brochures, etc. A list of the counseling and training files reviewed are in the District Office file.

In training files we looked for 888s, attendee lists, brochures with disclaimers, any listed program income and fees. A list of the training files reviewed is in the District Office file

We performed a random review of transactions from the financial area of the grant. . A copy of Account Details is attached to this report in our file along with various bills reviewed.

### FINDINGS

All client files contain LMI information, intake forms, write-ups and impact data. In cases where there were loans obtained, files had copies of emails, etc from the client making reference to such. Also, files where there were startup businesses contained press on the openings. Write-ups were such that another counselor could pick up the file and get a complete picture of the client and tell what help was needed next.

All training files had 888s, attendee lists, etc. Some did not have actual paper brochures just page that was on the web site, but all had appropriate disclaimers.

In the random review of transactions from the financial area of the grant we found an invoice for services from MyTown which was for services for the period August 1, 2007 through December 14, 2007. This bill was paid out of the 2008 funds. Another Bill from YourTown was for a workshop presenter for a workshop done in September, 2007. That bill was also paid out of the 2008 funds. I then reviewed the transactions and picked other bills that could have the same problem. A copy of Account Details is attached to this report in our file along with various bills reviewed.

I was assured by the accountant that the appropriate amount would be backed out from the grant funding for the two bills. She also assured me that she would review all other transactions to make sure that did not happen in other cases.

RECOMMENDED ACTIONS

By the time I returned to the office I received a letter from the Accountant showing the transactions performed to back out the amounts from the mentioned bills. Her e-mail also said that other transactions had been reviewed for accuracy. See attached e-mail.

Because of the above actions taken by the Accountant, I **do not** have any recommended action to be taken at this time.

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DOTR SIGNATURE AND DATE

ACTIONS TAKEN BY OWBO

(SEE CURE LETTER IF NEEDED)

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OWBO SIGNATURE AND DATE

Version VII- 5/27/08





## SAMPLE 2

### WBC GRANT MONITORING STATEMENT

WBC: \_\_\_\_\_ GRANT NO. \_\_\_\_\_

Period Reviewed: October 1, 2008 to February 28, 2009

#### MONITORING ACTION

This examination was conducted by Sandy, DOTR along with Lorna, BDS and backup DOTR.

Review of the Semi-Annual WBC Review Checklist showed several items needed to be reviewed by me in more detail.

1. Cash match has not been met. Documents show that match has been obtained but not spent for the 5 month period.
2. Change in key personnel not approved by OWBO.
3. No training events are taking place.

No finding from last years Final Review.

The programmatic part of this review was conducted at the Women's Business Center with Tonya, Director of the WBC and Karen, with the recipient organization and the financial part was conducted at the offices of MyWBC, office of grant recipient with Donnell and Denise.

For the programmatic part we reviewed random training files and counseling files. The financial part consisted of random review of transactions from ledgers. A list of the counseling and training files are in the District Office file.

We pulled random client files to review.

In client files we looked for LMI information, intake forms, write-ups and impact data, along with pertinent documents such as business plans, marketing plans, loan information, client brochures, etc.

In training files we look for 888s, attendee lists, brochures with disclaimers, any listed program income and fees for course.

We performed a random review of transactions from the financial area of the grant. . A copy of Account Details is attached to this report in our file along with various bills reviewed.

#### FINDINGS

All client files contain LMI information, intake forms, write ups and impact data. In cases

where there were loans obtained, files had copies of emails, etc from the client making reference to such. Also, files where there were startup businesses contained press on the opening. In those cases another counselor could pick up the file and get a complete picture of the client and tell what help was needed next.

There were no training files to review. Even though EDMIS showed training events the WBC did not have any training files to review.

In the random review of transactions from the financial area of the grant we did not find any problems with the invoices paid or any of the transactions.

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DOTR SIGNATURE AND DATE

ACTIONS TAKEN BY OWBO

(SEE CURE LETTER IF NEEDED)

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OWBO SIGNATURE AND DATE

Version VIII- 6/16/08