On-Site Monitoring / Technical Assistance Visits
VETS Competitive Grants Expert Team (CGET)

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Grant Officer's Technical Representative (GOTR) Defined

What is a GOTR?

The Director for Veterans' Employment and Training (DVET) usually serves as the GOTR and will conduct the following activities either themselves or through an Assigned Assistant Director for Veteran's Employment and Training (ADVET):

- *-- Conducts and leads grant monitoring activities;*
- *-- Provides on-going technical assistance including helping grantees to interpret the General and Special Provisions and other grant requirements;*
- *-- Identifies and assesses instances of non-compliance;*
- *-- Recommends and reviews appropriate corrective actions;*
- *-- Provides recommendations related to grantee requests for actions requiring grant officer approval.*

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Grant Officer's Technical Representative (GOTR) (cont.)

The GOTR is authorized to approve or conduct the following:

- *-- Technical matters not involving a change in the scope, cost, or conditions of the grant;*
- *-- Quarterly Technical Performance and Financial Status Reports;*
- *-- Submitted Corrective Action Plans (w/ Consensus);*
- *-- Requests for Direct Cost Category Transfers (Budget Line Item Deviations) of Less Than 10% (State and Local Government) or Less Than 5% (All Other Grantees) of the Total Grant Award;*
- *-- Review grantee expenditures and "disallow" costs not deemed appropriate; and*
- *-- Review and Recommend approval of requests for payment.*

DVET/GOTR is not authorized to direct any action that results in a change of scope, cost, terms or conditions unless specifically outlined in the special grant provisions.

Grant Officer's Technical Representative (GOTR) (cont.)

Most Importantly…
"Your assigned GOTR is a Liaison to Help You Meet Your Goals!"

-- *Notify your GOTR as soon as you perceive any operational difficulties – "Don't wait until the scheduled Quarterly Technical Reviews or On-Site Visits";*

-- *Your GOTR will help you to address your challenges before they negatively effect your performance by providing on-going technical assistance - "Your GOTR is Your Business Partner";*

-- *Maintain and initiate regular contact with your GOTR - "Your GOTR can help you redefine line Item priorities and will act as a liaison to the grant officer and the VETS National Office";*

-- *Let your GOTR know about your success!*

Grant Monitoring Process:
Quarterly Desk Reviews and On-Site Monitoring Visits.

Plan Versus Actual Comparisons. *Review current actual performance (both program and financial) data to determine if goals established in the Grant Agreement are being achieved. Includes an assessment of performance deviation related e-mails (+/- 15%) and a categorization of all elements being reviewed (meets expectations, exceeds expectations, and/or below expectations) within program narrative report.*

Managerial Assessments. *On-going review of the quality and the effectiveness of services provided and the networks and partnerships that have been developed including the grantees integration of DVOP / LVER personnel. Involves "troubleshooting" to determine the cause of identified problems, determining and ensuring corrective actions are implemented when required.*

Data Validity Check. *Systematic review to substantiate the program and financial information reported by the grantee which may include case files review and sampling, Budget Report Review including Object / Budget Class review, placement follow-up contact with participants and/ or employers etc.*

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Quarterly Desk Reviews

Quarterly Desk Reviews *are reviews of reports submitted by the grantee and whenever possible entered electronically into VOPAR directly or as an attachment, within 30 days after the end of each quarter including:*

-- *Quarterly Technical Performance Reports (Data entered into VOPAR);*

-- *Financial Status Report (SF269A);*

-- *Corrective Action Plan (when necessary);*

-- *Best Practices or Success Stories;*

-- *Program Narrative; and*

-- *Requests for payments and reimbursements (HHS/PMS SF272).*

Quarterly Desk Reviews (cont.)

Quarterly Desk Reviews Defined

The purpose of the quarterly desk review is to:

-- *Identify potential or existing problem areas;*

-- *Provide background information concerning program design; operational procedures, and previous monitoring activities; and*

-- *Identify the priorities/activities to be reviewed during the on-site visit.*

The GOTR will complete a Quarterly Grant Summary Report that is entered into VOPAR for Subsequent Review. The summary report contains:

-- *Narrative of quarterly activities;*

-- *Description of problem/potential problems or "Best Practices";*

-- *Summary of actions taken to resolve any issues w/ date(s) such action taken;*

-- *Indication of whether a CAP has been approved;*

-- *Assessment of whether a grant mod might be necessary; and*

-- *Any additional information.*

On-Site Monitoring Visits.

On-Site Monitoring Visits *may occur at anytime, however, the GOTR's "official" yearly visit is typically conducted at the end of the* <u>Second Quarter</u> *of the grant period which will involve the following:*

-- *Direct / general observation of grantee activities;*

-- *Interviews with key grantee, sub-contractor, and partner staff including DVOPs / LVERs;*

-- *Financial report review / Object class line Item review (SF424A);*

-- *Participant / Case file review; and*

-- *Employer verification (when appropriate).*

On-Site Monitoring Visits

On-Site Monitoring Visits Defined

The purpose of the GOTR on-site monitoring visit is to provide more in-depth review and to help address any issues of concern. The visit may be regularly scheduled (by the end of the second quarter) or triggered by a request of assistance, something discovered in the desk review, or some other cause or concern and should require at least two full days. The process is comprised of five steps which are explained in more detail as follows:

-- *Prepare for visit by reviewing existing information*

-- *Conduct on-site monitoring review;*

-- *Prepare documentation of findings;*

-- *Develop / implement Corrective Action Plan (CAP) as needed;*

-- *Initiating grant modification / changes as needed.*

On-Site Monitoring Visits (cont.)

Prepare for Visit by Reviewing Existing Information

The GOTR and the Grantee should prepare for each on-site monitoring visit by reviewing previously submitted Quarterly Technical Performance Reports and data within VOPAR, Quarterly Grant Summary Reports, the current SF424A with Addendum, the original Grant Agreement, and consider the following:

- *-- Identify program components that pose potential challenges;*
- *-- Identify key personnel to be interviewed within critical operational areas i.e. financial, programmatic (including subcontractor or partner organizations that are providing services) administrative staff, etc. Interviews should involve both managers and "front-line" personnel ;*
- *-- Implement a case file sampling plan and conduct review of current records including follow-up procedures and retention success;*
- *-- Collect Itemized list of Expenditures to Confirm SF424A Roll-up; and*
- *-- Determine what records will be examined, activities that will be observed, and what data needs to be collected.*

(See example On-site Monitoring Review Format)

On-Site Monitoring Visits (cont.)

Conduct On-Site Monitoring Review

The GOTR and the grantee should anticipate that the on-site review will take two days and will be comprised of the following:

-- *Formal notification of visit and information to be reviewed;*

-- *"Entrance Interview" to explain the purpose of the visit and to confirm agenda, data gathering checklist, written monitoring instrument and interview schedule (which all should be forwarded in advance of the visit);*

-- *On-site observation and implementation of written monitoring instrument (See next slide for more information);*

-- *"Exit Interview" to review any initial findings from the visit with key personnel and project director.*

On-Site Monitoring Visits (cont.)

Conduct On-Site Monitoring Review

Typical components of the on-site monitoring instrument:

    -- *Review financial and non-financial records (Ensure GAAP compliance);*

    -- *Review administrative and management structure and systems;*

    -- *Review participants flow through the program;*

    -- *Review documentation of visits to work sites and training institutions; and*

    -- *Review other Items or questions identified during the "Desk Reviews".*

Participant / case file review is used to:

    -- *Validate previously submitted data, eligibility of participants, and activities; proposed/planned are being carried out;*

    -- *Ensure that all record keeping requirements are known and being followed;*

    -- *Focus Interviews and observations; and*

    -- *Monitor program costs and specific expenditures.*

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On-Site Monitoring Visits (cont.)

Conduct On-Site Monitoring Review

Staff / Client Interviews can provide useful information about program operations. Interviews should help GOTR's to:

-- *Validate / expand upon desk review information through case file reviews, and other on-site activities;*

-- *Obtain unique and important qualitative information about the program;*

-- *Develop detailed understanding of DVOP / LVER role in the program;*

-- *Identify causes of problems, deficiencies or examples of exceptional performance; and*

-- *Identifying management / admin. issues requiring more in-depth review.*

Candidates for Interviews Include:

-- *Managers, trainers, counselors, job developers, financial analysts, etc.;*

-- *Leaders and members of interest groups (VSO's) and networking partners, including DVOPs / LVERS; and*

-- *Clients / Participants of the program.*

On-Site Monitoring Visits (cont.)

Prepare Documentation of Findings

The GOTR will prepare a written report on the results of the on-site monitoring visit and enter that report into VOPAR as an attachment. The responsible RAVET will review and recommend to the VETS National Office, if necessary, any formal follow up action. The report must summarize the findings of the on-site visit and be submitted to the grantee for review within 10 days after the visit.

The four general types of findings report and the appropriate GOTR Response are:
- *-- Grantee is exceeding goals – <u>No Further Action Required</u>;*
- *-- Grantee has no problems or potential problems - <u>No Further Action Required</u>;*
- *-- Grantee has some potential problems - <u>Recommendations / Follow – Up Required</u>;*
- *-- Grantee requires a CAP / possible "High Risk" designation – <u>Follow –Up Required.</u>*

On-Site Monitoring Visits (cont.)

Develop / Implement Corrective Action Plan (CAP) as Needed

"Initiating a CAP is the Grantees Responsibility When Technical and Financial Performance Goals Deviate +/- 15% or More"

Grantees <u>must</u> inform the GOTR of any significant developments affecting the ability to accomplish program goals. Whenever actual quarterly grant accomplishments vary by a margin of +/- 15% or more from planned goals, the <u>grantee</u> is obligated to initiate a CAP that should be submitted as an addendum to the Quarterly Technical Performance Report. Please note that this is a general "rule of thumb" – in some cases +/- 15% deviations are beneficial to the program i.e. more placements into employment or training than planned, etc. When the +/- 15% deviation is an actual benefit a CAP is <u>not</u> required.

After an On-site Monitoring visit, a GOTR, if findings warrant, may indicate that a CAP is necessary. The GOTR will inform Grantee and offer technical assistance to bring the grant into compliance. A timeframe for receipt of the CAP will also be established with the grantee.

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On-Site Monitoring Visits (cont.)

Develop / Implement Corrective Action Plan (CAP) as Needed – cont.

The CAP should have the following components and will be approved by all parties (GOTR/DVET, RAVET, VETS National Office and Grant Officer):

-- *Identify the specific activities (With a +/- 15 % deviation) and describe the problems being addressed and the reasons for the variance;*

-- *Provide a specific step-by-step plan to correct the problems; and*

-- *Provide a schedule and timetable for accomplishment of the correction.*

On-Site Monitoring Visits (cont.)

Develop / Implement Corrective Action Plan (CAP) As Needed - cont.

"High Risk" Designation Defined

Serious cases may lead to a "High Risk" designation if a consensus between the GOTR/DVET, RAVET, and VETS National Office occurs. A "High Risk" designation is a clear warning to the grantee that significant aspects of their operations are not being conducted according to plan and that changes to address these aspects must be implemented. Many "High Risk" designations occur during the annual option year grant modification process to ensure that the grantee will get more comprehensive and structured technical assistance.

Once a "High Risk" designation occurs, the GOTR:

-- *Facilitates VETS correspondences and confirms grantee receipt of letter notification by VETS National Office;*

-- *Monitors actions identified in the letter that need to be completed and scheduled timeframe for completion;*

-- *Provides structured monthly technical assistance visits and/or other communications.*

On-Site Monitoring Visits. (cont.)

Initiating Grant Modifications / Changes As Needed

Basically stated, grant modifications are used when the grantee cannot comply with the grant agreement, and a change to the SF424 or the SF424A is required. They can occur at anytime during the grant period, however, mod requests need to be submitted at least 45-60 days before the expiration of the grant.

Grant modifications are generally not instituted to merely reduced previously agreed upon performance goals and they are not always accepted. Essentially, any change to a grant that deviates from the approved SF424 or SF424A requires a Grant Modification including:

- *-- Changes in the grant start or end date;*
- *-- Any increase in expenditures or any expenditure decrease of more than 5%; and*
- *-- Any increase / decrease of more than 15 percent in performance goals substantiated with justification.*

On-Site Monitoring Visits. (cont.)

Initiating Grant Modifications / Changes As Needed (cont.)

When requesting a grant modification, follow these steps:

-- *Ensure that the modification request is accompanied by the required forms and that the changes reflected in the SF424, the SF424A, the Budget Narrative, and the New Goals Chart are consistent;*

-- *Ensure that forms are completed correctly. Be especially sensitive to request for extensions and how that effects the reporting timetables and project duration;*

-- *Explain requested modification in the same detail as original application. All requests for modification must contain information to justify the request;*

-- *Failure to follow these steps and / or an inability to justify non-compliance may result in sanctions or penalties such as: withholding of funds, Suspension, and early termination; and*

-- *Grant Modification related to projects that are exceeding their goals may be be identified as a "Best Practices" model program.*

Situational Examples

Line by Line Item Object Class Category Verification Process
& the Budget Narrative

-- *Explains Process to Expect;*

-- *Illustrates what is required within the Budget Narrative Report; and*

-- *Discuss "Disallowable Costs" – i.e. Auto & housing expenses.*

Potential "CAP" Situation: Expenditures Not Obligated Per Plan Because of "Start-Up" or Other Extenuating Circumstances

-- *Seek GOTR advice and intervention;*

-- *Possibility to to move funds to other categories; and*

-- *Discuss grant modification procedures.*

Forms / Instructions

Quarterly Desk Review Format / Instructions - *Example*

On-site Monitoring Review Format / Instructions - *Example*

Allowable and Unallowable Costs

SF269A Form and Instructions

SF424 / SF424A Form and Instructions

Questions & Answers

Additional Information: *Copies of conference presentations and key grantee forms and instructions will be available on the U. S. Department of Labor / VETS home page soon after the end of conference:*

http://www.dol.gov/vets/