



An Overview
of
Subawardee Monitoring
for
FVPSA State Administrators

Presenters

Kim Feeney, FVPSA

Rebecca Odor, FVPSA

Tonia Moultry, NNEDV

EllenYin-Wycoff, NNEDV

Training Goals

- ▶ To provide a general overview and purpose of monitoring subawardee grantees of FVPSA funds
- ▶ To address the elements to be included in monitoring and the different forms of monitoring
- ▶ To promote collaboration with state and tribal coalitions with monitoring of domestic violence program grantees

Definitions

- ▶ The subawardee is the recipient of a grant award (or legal contract) from a pass-through entity (such as state) to carry out part of a Federal award received and administered by the pass-through entity.
- ▶ The subawardee can also be considered a subgrantee or subrecipient of the federal award from the pass-through entity.
- ▶ The subawardee is subject to meet the federal requirements of the subaward.

Why is Monitoring Required?

- ▶ FVPSA charges the Secretary of the US Dept. of HHS to ensure there is accountability and transparency of the action of the all grantees and contractors. It also requires HHS to review and evaluate the activities of grantees, subawardees, and contractors about the effectiveness of FVPSA for a report to Congress.
- ▶ As a result of this charge, post-award monitoring is part of this review and evaluation process for subawardees.

FVPSA Program Grant Monitoring Objectives

The objectives of the FVPSA Program's grant monitoring are to:

- recognize and document best and promising practices, innovative services, program strengths and significant collaborations;
- assess subawardee's level of performance with programmatic requirements including the FVPSA Program's policy for ensuring accessible services to diverse groups of survivors and diverse communities;
- assess subawardee's level of compliance with the administrative and financial requirements of relevant statutes, regulations, policies, and guidelines and/or special conditions applied to a specific award;
- verify that programs/projects initiated by subawardees are carried out in a manner consistent with the subawardee's approved project goals and objectives;

FVPSA Program Grant Monitoring Objectives

The objectives of the FVPSA Program's grant monitoring are to:

- promote responsible stewardship of awarded funds by reporting fraud, waste, and abuse, as well as suspected violations, serious irregularities, and sensitive issues;
- identify subawardee's technical assistance needs to inform FVPSA-supported training and technical assistance efforts including grantee meetings;
- provide guidance or technical assistance to grantees on the FVPSA Program's policies and procedures, grant program requirements, general federal regulations, and basic programmatic, administrative, and financial reporting requirements; and
- encourage information sharing between the FVPSA Program and its subawardees especially relating to ACF and ACYF priority areas as well as what is happening in the field, including trends in services, shifting funding sources, and challenges and barriers faced by survivors.

Purpose of Monitoring

1. To ensure the subawardee is in compliance with the FVPSA requirements
2. To identify and resolve problems by the subawardee that may impede services provided to survivors of domestic violence and their children.

Positive Outcomes of Monitoring

- ▶ Assesses subawardee's levels of performance with FVPSA's programmatic requirements
- ▶ Assesses subawardee's levels of compliance with the administrative and financial requirements
- ▶ Verifies the programs/projects initiated by subawardees are carried out in a manner consistent with the subawardee's approved goals and objectives
- ▶ Promote responsible stewardship of the grant funds
- ▶ Identify subawardee's TA needs
- ▶ Encourage information sharing between the FVPSA program and its subawardees.

Role of Monitoring

It is within the administrator's purview to decide, in conjunction with a state agency, the format, depth, and frequency of monitoring.

Administrators must assess their own resources (including time, budget, number of programs funded, and distance between programs) to decide what type of monitoring works best for their state.

The Administrator's role is to manage the federal grant, not the individual local program's daily operations.

(See 45 CFR 75.352(b-h) for more info)

TYPES OF MONITORING

Programmatic Review



- ▶ To ensure that the FVPSA programmatic and grant objectives are met, including data collection and programmatic reporting.
- ▶ This should include review of progress reports, statistics and other documents to ensure the subawardee is on target with their programmatic objectives within their grant award.

Programmatic Review

- ▶ Review the subawardee's policies and procedures for data collection and services to survivors to ensure victim safety.
- ▶ This includes a review of the agency's confidentiality policy, safety planning procedures (on the crisis line and in-person).

Sample Questions for Programmatic Review:

- ▶ Subawardee meets the following requirements:
 1. have as their primary purpose the operation of shelters for domestic violence survivors and their dependents; or
 2. provide counseling, advocacy and self-help services to domestic violence survivors and their dependents.
- ▶ How does the subawardee develop safety plans with survivors? What provisions does the subawardee have for ensuring that this is accomplished using a trauma-informed approach? What training is provided to staff to ensure that effective, timely and useful safety plans are being developed? What oversight is provided?
- ▶ Are group counseling and peer support groups being offered to all survivors regardless of sex, sexual orientation or gender? How does the subawardee make referrals for community-based services? What training is provided to staff to ensure that counseling and support groups are inclusive and responsive to survivors seeking these services? What oversight is provided?

Sample Questions for Programmatic Review:

- ▶ Does the subawardee have a Language Access Plan? How does the subawardee provide culturally appropriate, culturally sensitive or culturally specific services?
- ▶ What are they doing for children, specifically? What evidence-based, promising or best practices are used?
- ▶ What types of financial assistance does the subawardee provide for survivors using FVPSA funds, e.g., lock changes, gas in a survivor's car, food vouchers? If financial assistance is provided does the subawardee pay a third party directly? Does every survivor/client have access to the same assistance?
- ▶ What is the policy and/or procedure when survivors decline voluntary services? How are their needs met? What is the on-going engagement between advocates and those in shelter or accessing other non-residential services?

Organizational Capacity Review

- ▶ Review of subawardee's organizational structure – board, governing body, supervisory structure, etc.
- ▶ Review of staffing to ensure it can accomplish the activities and that staff are trained and knowledgeable in conducting their specific job responsibilities.
- ▶ Documents might include Personnel Handbook, Policies and Procedures Handbook, bylaws, board minutes, etc.

Financial/Fiscal Review

- ▶ To ensure the subawardee has sound financial practices, policies and procedures (that include Board of Director's oversight).
- ▶ This includes a review of their financial reports and documentation to ensure the subawardee is on target with their budget and that expenses are reasonable, allowable and allocable under FVPSA.
- ▶ You may need to coordinate with your Financial counterparts (within your state agency) to connect the financial review with the Administrator's programmatic review for the monitoring reports.

Safety Monitoring

- ▶ To conduct a review that the subawardee has met the requirements and inspections for their facility (shelter, etc.) to meet the necessary local and state safety requirements. *This does not mean creating a separate safety monitoring process.*
- ▶ This includes ensuring the physical safety of the shelter and program facilities
- ▶ Review subawardee's safety protocols to address and report critical incidents should they occur.

Client Files and Confidentiality

- ▶ Ideally, states should find ways to accomplish monitoring tasks without accessing client records.
- ▶ Administrators should not expect to have access to client's personal identifying information, in order to preserve the confidentiality of survivors and their children.
- ▶ If files must be reviewed as part of the monitoring or TA, personally identifying information **MUST** be redacted or hidden before the administrator reviews the file.

Polling Question

Do you look at redacted client files during a monitoring visit?

- A. Yes
- B. No
- C. Sometimes
- D. Don't know

*If you responded **no**, please share in the chat box how your state accomplishes monitoring without reviewing client files.*

METHODS OF MONITORING

Monitoring Methods

1. Onsite Monitoring
2. Desk & Virtual Monitoring
3. Peer to Peer

Onsite Monitoring

- ▶ It allows for the administrator to meet the subawardee's staff, volunteers, and Board members to observe daily operations of the agency.
- ▶ It is an opportunity to learn about the subawardee's achievements, learn about needs and trends, identify challenges, and develop a plan on how to address/resolve these challenges with TA from their coalition.
- ▶ The onsite monitoring visit should be scheduled in advance with sufficient notice given to the subawardee.

Onsite Monitoring

- ▶ This type of monitoring will include some desk review of agency paperwork and policies before going out:
 - ▶ Welcome/Intake packet for survivors, personnel policies, fiscal/financial procedures, anti-discrimination and confidentiality policies, safety procedures, Board bylaws and minutes from recent meetings, etc.)
- ▶ Some aspects of fiscal review may occur as well before the onsite visit and fiscal officer may accompany the state administrator on the visit.

Onsite Monitoring Notice

The notice should include:

- ▶ Who will be interviewed, purpose of the interviews, and length of time needed;
- ▶ Any facilities/programs that will be toured and for what purpose;
- ▶ What policies, procedures, or forms will be reviewed either before or during the visit;
- ▶ Questions to be asked/reviewed (*see questions from the Programmatic Review Slides*); and
- ▶ The purpose of the site visit.

Polling Question

What are sample questions and forms that you have for a Monitoring Visit?

Please type your responses in the chat box.

Desk or Virtual Monitoring

- ▶ It is usually completed at the Administrator's office
- ▶ It can be conducted throughout the year as part of ongoing maintenance or at a designated time of the year to include a more detailed review.

Examples:

- ▶ Scheduling a video-conference meeting or conference call with the subawardee's staff, volunteers, and Board to interview them as you would for a site visit. Subawardee submits programmatic and financial documents for review by the Administrator.

Peer to Peer Monitoring

- ▶ Peer to Peer review is when a group of people or an individual who work in the same field as the subawardee conducts a review of the program and help instill best practices and evaluate compliance.
- ▶ It is helpful for the administrator to create protocols for peer review team members to guide their monitoring visit.
- ▶ Administrators should ensure team members are properly trained before assigning them for a site visit and that the team is balanced in terms of skills and experience. There should also be a review to ensure there is no conflict of interest between a peer reviewer and the subawardee.

Monitoring Reports

A monitoring report should be issued to the subawardee following any completed monitoring activity.

The report should summarize the findings of the monitoring in an objective and clearly written report that includes:

- ▶ Achievements and what is working
- ▶ Recommendations and/or corrective action plan with due dates (if needed)
- ▶ Resources and/or TA that is available (usually through the state coalition or tribal coalition)
- ▶ Appeals process

Polling Question

How often do you schedule monitoring of each subawardee?

- A. Once a year
- B. Every other year
- C. Only as needed
- D. Other (please note in the chat box)

Frequency of Monitoring

- ▶ There is no set requirement on how frequent monitoring needs to occur with subawardees.
- ▶ Administrators can determine when and how often monitoring can occur with subawardees. There is no requirement to monitor every subawardee every year. However, best practice indicates that Administrators should plan to monitor every subawardee within 2 – 3 years or sooner depending on the risk assessment of each subawardee.
- ▶ Administrators can also determine or develop a risk assessment to prioritize high risk subawardees for more frequent or onsite monitoring, if necessary.

Risk Assessment

As noted in CFR §75.352, these are the requirements for pass-through entities:

- ▶ State must evaluate the subawardee's risk for noncompliance with the Federal regulations and terms & conditions of the subaward that can include the following factors for purposes of monitoring:
 1. The subawardee's prior experience with the same or similar subawards;
 2. The results of previous audits including whether or not the subawardee receives a Single Audit (if they meet the federal threshold of \$750,000 in federal awards), and the extent to which the same or similar subaward has been audited as a major program;
 3. Whether the subawardee has new personnel or new or substantially changed systems; and
 4. The extent and results of HHS awarding agency monitoring (e.g., if the subawardee also receives Federal awards directly from a HHS awarding agency).

Polling Question

Do you have a policy or practice on determining which subawardee needs a monitoring visit? Are you willing to share your written policies with us to distribute with other administrators?

Please type your response in the chat box.



COLLABORATION WITH STATE & TRIBAL COALITIONS

Polling Question

Have you or your agency collaborated with the state and tribal coalitions in monitoring subawardees?

- A. Yes, we collaborate regularly about all subawardees
- B. Yes, when there is a concern about a specific subawardee
- C. Yes, my state passes the funds through the coalition to the local programs
- D. Occasionally for special circumstances (new administrator, program with history of problems, administrator wants TA information to provide)
- E. No, we don't collaborate in this way with the state and/or tribal coalition

Collaboration with State and Tribal Coalitions

Coalitions can assist and support with the following:

- ▶ Assist in the development of the monitoring templates for use in the monitoring activities
- ▶ Assist and support in conducting onsite monitoring visits
- ▶ Provide recommendations and training for potential reviewers for peer to peer monitoring
- ▶ Provide follow-up TA and consultation for subawardees as noted in the monitoring report's recommendations and/or corrective action plans

NNEDV's Private Resource Library for Administrators

FVPSA State Administrators can access resources, guidance documents, and materials at:

<http://resources.nnedv.org/groups/17/resources>

You will be given a private login access to this library and can also participate in discussion with other State Administrators at:

<http://resources.nnedv.org/groups/17/discussions>



Any additional questions?

Please feel free to type them in the chat box.



Thank you for your participation!

For more information, please feel free to
contact the NNEDV TA Team at:

capacity_ta@nnedv.org