

WYOCSP | Wyoming Community Services Program

Dated: November 14, 2019
To: Community Services Block Grant (CSBG) Grantees
From: Community Services Program
Reference: CSBG Policy #3: Monitoring Policy and Procedure

POLICY #3

CSP will monitor all grantees for compliance with performance goals, administrative standards, financial management requirements, federal statutes, and state requirements. Grantees will monitor all Sub-grantees for compliance with performance goals, administrative standards, financial management requirements, federal statutes, and state requirements annually.

At a minimum, CSP will conduct:

- a full on-site review of each grantee at least once during a three (3) year period;
- a full on-site review of each newly designated Grantee immediately after the completion of the first year in which such entity receives funds through CSP;
- a desk review of each eligible entity, who is not being monitored on-site during the current grant cycle, at least once annually;
- follow-up reviews, including prompt return visits to Grantees and their Sub-grantees, that fail to meet the goals, standards, and requirements established by the CSBG Act and the State Plan, as necessary; and
- other reviews as appropriate, including reviews of Grantees and their Sub-grantees that have had other federal, state or local grants terminated for cause.

Furthermore, if a Grantee's award has not been terminated, but it appears that there are significant management, programmatic, or financial problems, CSP may perform a "special" review as needed. CSP may also perform a "special" review of any Sub-grantee if it appears that there is significant management, programmatic, or financial problems, as needed.

Monitoring activities for both Grantees and Sub-grantees can include, but are not limited to:

- verification of contract compliance;
- observation of service provision and types of assistance provided;

- provision of training and technical assistance in direct services and administrative areas by the grantee for its staff persons and for its sub-grantees;
- attendance at regularly-scheduled governing board meetings, to observe board functioning and operation to verify consistency with the provisions of proper Tripartite Board practices and procedures;
- review of the governing board files to verify board composition and to review minutes for verification of proper board practices;
- review of the client and related program files to ensure appropriate paper trails, with emphasis on income eligibility verification; documentation of funds used and purpose; case management;
- one-on-one contact with grantees and sub-grantees (to the extent practicable) staff persons for the purpose of soliciting input with regard to program performance and other areas;
- one-on-one contact with current program clients and/or ex-clients (to the extent practicable) for the purpose of soliciting input as to options about program effectiveness, and related areas;
- confirmation of each grantee's (and sub-grantee's) last audit, and the period covered;
- conversations with staff members of grantees and sub-grantees for the purpose of ascertaining what kinds of opportunity for corrective action and improvement is needed;
- consistent contact with grantees and sub-grantees by telephone, in writing, or at information-sharing meetings;
- collection of data and information from grantees and sub-grantees (i.e., monthly performance and fiscal reports) in addition to other information either requested or voluntarily submitted to CSP; and
- review of annual grant applications to assure compliance with federal and state assurances, and all applicable requirements of the CSBG Act.

PROCEDURE

CSP Monitoring of Grantees

Before the CSP conducts a program on-site monitoring visit of a Grantee and/or its Sub-grantees, the Grantee will receive advance notice of the proposed on-site visit, no less than 30 days before. Prior to conducting the on-site visit, the CSP will complete the desk monitoring tool as a preliminary review. Any questions that could not be answered via the desk monitoring procedure will be address during the on-site visit. Prior to the on-site visit, the CSP will send the Grantee the CSBG Risk Assessment and the Internal Controls Questionnaire for completion no later than two weeks before the scheduled on-site visit. These documents can be mailed, faxed, or emailed.

During the program on-site monitoring visit, the CSP will complete a thorough review using a monitoring tool. This tool will be provided to the Grantee with the program on-site monitoring visit notification letter and posted on the Wyoming Department of Health, Community Services Program webpage.

In order for the CSP to be efficient with the time allotted for a program on-site monitoring visit, the Grantee and/or its Sub-grantees are required to make requested documents available for the CSP to review. Additional documentation may be requested in advance of the on-site visit.

Upon completion of the program on-site monitoring review, the CSP will conduct an exit conference, with the Grantee and/or its Sub-grantees reviewed. Preliminary areas of noncompliance discovered during the on-site visit will be summarized and discussed with the Grantee and/or its Sub-grantees during the exit conference. During such, the Grantee and/or its Sub-grantees will be given the opportunity to provide comments and present additional information or explanation regarding specific deficiencies as time permits.

The CSP will complete a formal monitoring report, outlining any findings the Grantee and/or its Sub-grantees may have in relation to any areas of monitoring. A brief description will be provided for each finding, as well as reference to any relevant OMB Circular, CSBG Act, CSP policy, or any other relevant guidance. A clear explanation as to why the evidence gathered led to the CSP to conclude that the Grantee and/or its Sub-grantees are not in compliance will be provided. The CSP may then decide to issue a Corrective Action Plan (CAPL) or a Quality Improvement Plan (QIP) in relation to the findings. Guidance on the two is addressed within the Corrective Action Plan (CAPL) and Quality Improvement Plan (QIP) section (page number?).

Grantee Monitoring of Sub-Grantees

Grantees must conduct a program on-site monitoring visit for each of their Sub-grantees at least once every contract year. The CSP has developed a Sub-grantee monitoring tool that Grantees may use during their monitoring visit, however the use of such is not required. The Grantee must monitor the following areas for compliance:

- a. Administrative review
- b. Programmatic review
- c. Contractual compliance
- d. Fiscal controls and procedures
- e. Clients files and eligibility
- f. Results Oriented Management and Accountability (ROMA)

The Grantee must complete a formal monitoring report, outlining any findings the Sub-

grantee(s) may have in relation to any areas of monitoring. The formal monitoring report should be completed within 60 days after the visit and copies of the report should be provided to the Sub-grantee(s) and the CSP. A brief description will be provided for each finding, as well as reference to any relevant OMB Circular, CSBG Act, CSP policy, or any other relevant guidance. A clear explanation as to why the evidence gathered led the Grantee to conclude that its Sub-grantee(s) are not in compliance must be provided. Any Sub-grantee with significant findings should be placed on a Corrective Action Plan (CAPL) or a Quality Improvement Plan (QIP). A follow-up visit should be scheduled no later than one year of the first visit, or consistent with the timeframe established in the CAPL or QIP. A follow-up report should be completed within 60 days after the follow-up and copies of the follow-up report should be provided to the sub-grantee and the CSP. Any consistent noncompliance issues should be reported to the CSP as appropriate.

- a. The Grantee must have a policy in place to address monitoring findings and corrective action and resolution of such. The Grantee may choose to adopt the CSP's policy (Policy #4: Correction Action, Termination, or Reduction of Funding) as their own. Addressing monitoring findings must follow Grantee policy.
- b. Grantees must inform the CSP of any monitoring findings, either within the monitoring report, or through its own separate document. The CSP may choose to do a follow-up monitoring visit, or carefully monitor the resolution of Sub-grantees' findings throughout the fiscal year and beyond.

Desk Monitoring

The CSP will complete a desk monitoring tool with the necessary use of documentation uploaded into CAP60, any expenditure reports and fiscal documents sent to the CSP monthly for reimbursement, as well as through the use of requested additional documents and materials made available to the CSP by the Grantee and/or its Sub-grantees. It is the CSP's discretion to select the documents and materials for desk review.

The CSP will complete a formal desk monitoring report, outlining any findings the Grantee and/or its Sub-grantees may have in relation to any areas of monitoring. A brief description will be provided for each finding, as well as reference to any relevant OMB Circular, CSBG Act, CSP policy, or any other relevant guidance. A clear explanation as to why the evidence gathered led to the CSP to conclude that the Grantee and/or its Sub-grantees are not in compliance will be provided. The CSP may then decide to issue a Corrective Action Plan (CAPL) or a Quality Improvement Plan (QIP) in relation to the findings. Guidance on the two is addressed within the Corrective Action Plan (CAPL) and Quality Improvement Plan (QIP).