

WHAT TO EXPECT DURING A CED ON-SITE MONITORING VISIT

Info Gain Consulting
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CED

Community Economic Development

Agenda

- Purpose of On-Site Monitoring
- Preparing for On-Site Monitoring
- Grantee Selection
- Pre-site Visit Timeline & Activities
- The Site Visit
- Post-site Visit Timeline & Activities
- Common Concerns & Best Practices

Key Federal Staff

- **CED Program Specialist –**
 - Assigned to the Office of Community Service (OCS)
 - Responsible for programmatic compliance with applicable laws, regulations, policies, and procedures
- **Grants Management Specialist –**
 - Assigned to the Office of Grants Management (OGM)
 - Responsible for business and other non-programmatic areas of grant award and administration ensuring compliance with applicable laws, regulations, policies, and procedures and technical aspects of grants and fiscal monitoring.
 - Official receipt point for SF-425 reports and requests for prior approval

Purpose of On-Site Monitoring

- To conduct a Programmatic Review
- To conduct a Financial Review
- Visual observation of the project
- Monitor grantee actual performance versus timeline in the proposed grant application
- Interview Board members, Project Partners and Recipients of the jobs created
- Identify successes, red flags, best practices, TA needs

Key Questions

1. Is the Grant creating jobs for individuals with low-income?
2. Is the Grant receiving non-CED funding to support the project success? If so, from whom and how much?
3. Are the financials and programmatic activities in compliance with proposed project? If not, why?
4. What project goals have been reached?

Prior to On-Site Monitoring

- Programmatic Review
 - Review Application
 - Review all Performance Progress Reports (PPRs)
 - Review all notes in GrantSolutions (GS)
 - Consult with your assigned CED Program Specialist
- Financial Review
 - Review the application's budget and business plans
 - Financial Document and Accounting Systems

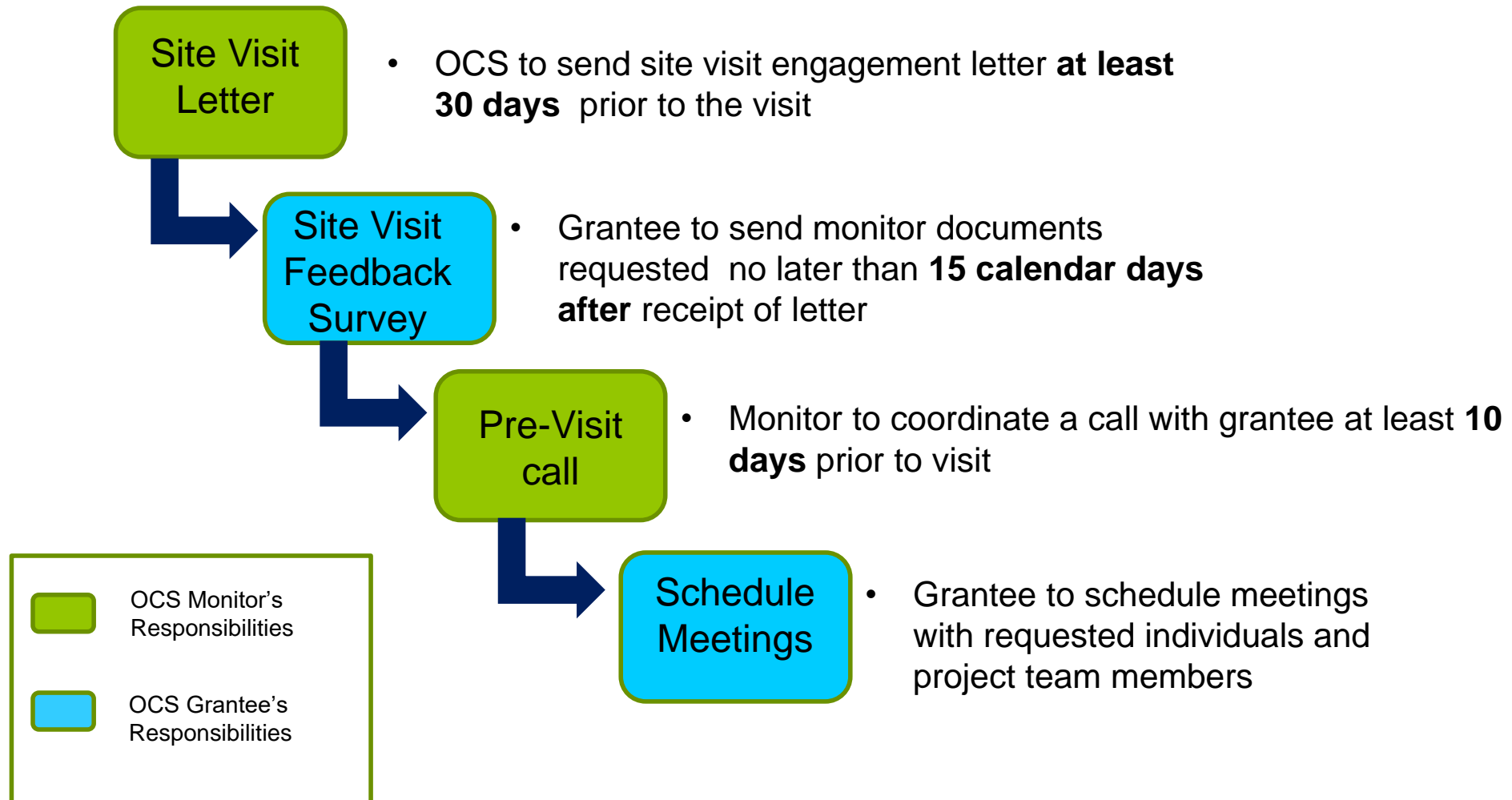
Key Monitoring Documents

- Funded Application
- HHS Grants Policy Statement
- 45 CFR Part 75
- 2 CFR Part 200
- Notice of Award (NOA)
 - Item # 16 – Approved Budget
 - Item # 17 – Award Computation (Federal & Non-Federal Share)
 - Item # 26 – Remarks provides details on the terms and condition of the award.
- Terms and Condition of the Award

Grantee Selection

- Number of active CED grants
- Date of last on-site monitoring visit
- Year in grant life cycle
- Performance results
- Compliance with programmatic and financial reporting

Pre-Site Visit Timeline



Grantee Responsibilities

- Key grantee staff participate on a call with monitor 10 days after on-site visit notification letter is sent.
- Submit all requested documents 20 days after engagement letter is sent.
- Gather and provide requested materials in **timely manner**
- Collaborate with monitor to prepare a realistic agenda
- Arrange interviews with agency staff, board members, project partners, and job recipients
- Brief agency staff and partners about visit objectives

Document Submission Prior to Visit

- Most recent Independent Audit Report
- List of all program income related to the CED grant
- Documentation of businesses created or expanded
- Documentation of permanent, full-time positions created (w/salaries and benefits)

Document Submission Prior to Visit

- List of all bank accounts associated with the CED grant
- List of loans, collaterals pledged, and supporting documentation
- Copies of signed Contracts
- Copies final signed loan documents.
- Listing of individuals/organizations that have or are projected to have ownership interest in the project

Documents Needed During the Visit

- Proof of Notice of Federal Interest (NFI) filing with the local jurisdiction (if applicable)
- Reconciliation procedures between fixed asset system and general ledger
- Written organizational procedures for funds drawdown
- Procedures for any asset operated by a third party related to the CED grant
- Written codes of conduct for employees engaged in the grant
- Procurement procedures

Documents Needed During the Visit

- Board of Directors meeting minutes (from inception of grant to the time of site visit)
- Proof of insurance coverage for assets related to the CED grant (if applicable)
- Letters, Beneficiary Agreements, Memoranda of Understanding (MOUs) entered into after the grant award
- Temporary Assistance for Needy Families (TANF) & Child Support Enforcement (CSE) agreements
- List of collaborating organizations

The Site Visit

- Compare proposed to actual jobs created
- Verify the accuracy of the programmatic and financial reports (PPRs and SF 425s)
- Verify the amount and use of leveraged non-Federal funds and in-kind services

The Site Visit

- Assessment of financial management system
- Review of program income
- Verification of budget revision approval

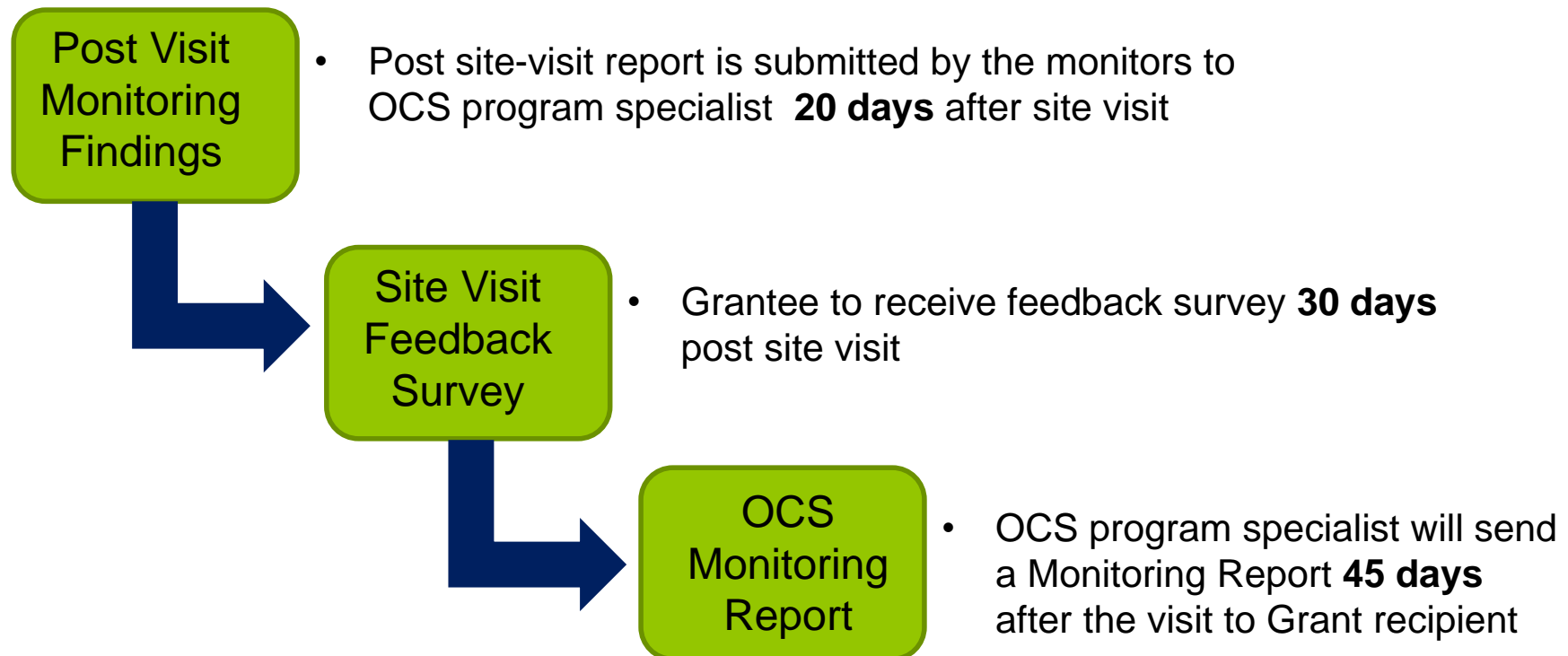
The Site Visit

- Physical visit of project site
- Verification of equipment & real property
- Interviews with clients, staff, and board members, community partners, low-income individuals hired through grant

The Site Visit

- Discussion of project challenges, such as,
 - Delays in project implementation
 - Changes in organizational leaders
 - Changes in partners
 - Changes in financing structure of the project

Post-Site Visit Timeline



Common Project Concerns

- Failure to file Notice of Federal Interest
- Inadequate financial accounting systems
- Inadequate written program procedures
- Inaccurate accounting, documenting, of jobs created
- Failure to create full-time jobs for individuals with low-income – at least 75% required!

Ensuring a Successful Visit

- Requested documents submitted on time
 - *Documents to be reviewed on site are organized and readily available*
- Contact with assigned monitor prior to the visit-
REQUIRED!
- Site visit interviews are scheduled
- Tour of the CED-funded project
- Board member(s) are available to discuss the progression of the grant

Ensuring a Successful Visit

Answer these **Key Questions**:

1. Does use of funds match the project budget in the application?
2. If not -
 - Was a change for the use of funds ACF approved?
 - Is there documentation at GS to support that approval?

2024 Site Visits

- 10 grantees
- Completed prior to September 30, 2024

OCS Monitoring Team

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Useful Links

1. [CED Guidance and Policies](https://www.acf.hhs.gov/ocs/resource/ced-guidance-and-policies) - <https://www.acf.hhs.gov/ocs/resource/ced-guidance-and-policies>
2. [PPR Information](https://www.acf.hhs.gov/ocs/form/ced-ppr-forms-and-instructions) - <https://www.acf.hhs.gov/ocs/form/ced-ppr-forms-and-instructions>
3. [New Grantee Information](https://www.acf.hhs.gov/ocs/resource/new-grantee-resources) - <https://www.acf.hhs.gov/ocs/resource/new-grantee-resources>
4. [HHS Poverty Guidelines for Job Creation](https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/frequently-asked-questions-related-poverty-guidelines-poverty) - <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/frequently-asked-questions-related-poverty-guidelines-poverty>