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Title: 040324-508051-DeptofEducation-Subrecipient-EnglishTranscript

Speaker 0 00:00:00 Welcome all, and thank you for joining today's Subrecipient Monitoring call. Please note that this call is being recorded, and all attendee lines are currently muted. Just to reduce background noise, before we do get started, please make sure you have opened your Webex chat panel by clicking the chat bubble icon at the bottom right corner of your screen. If you have any questions throughout the presentation, you can please send them through the chat to all panelists. With that, I'd like to formally begin today's call and turn it over to Melissa Schroeder, Technical Assistance Lead for the Office of State and Grantee Relations. Please go ahead.

Speaker 1 00:00:46 Thank you, and good afternoon. Thank you for joining us today for this presentation on Subrecipient Monitoring. I'm pleased to be joined today by my colleagues from the department's grants management policy division, Dr. Sandra Toro and David Downey. But before we begin, I just want to note that this session is being recorded as the event producer stated and will be posted on our website in the coming weeks. Also note that we'll be sharing some resources today provided by grantees, and that the department does not control or guarantee the accuracy or completeness of any non-departmental information that that is shared today. And lastly, please feel free to use the chat feature at any time throughout the presentation to ask questions, and we'll do our best to respond to those questions as we move through the content. Without further ado, I'm going to toss it over to David to get started.

Speaker 2 00:01:39 Thank you, Melissa. Hello everybody, and welcome to today's session. We're excited to be with you. Sandy, how are you doing?

Speaker 3 00:01:48 I'm doing great. Happy to be here. Hi, everyone.

Speaker 2 00:01:52 Well, you know, Sandy, you know, you and I, when we get a chance to talk, whether it's with the program staff here at the Department of Ed or our grant or our grantee community, there's few topics that can seemingly be as exciting as important, as wonderful as Subrecipient monitoring. Silas let's go to the next slide and let's see what today is going to bring us. Now, during our time together, we've got a 90-minute session here. We, we do want to make sure that, to utilize the chat as it was said, so we want to have a full engagement. We're going to talk to you about outlining the Subrecipient monitoring requirements. We're going to talk about the uniform guidance. And yes, we are in the last few days of the current versions. BB before it gets updated, it's going to be issued, before we know it.

Speaker 2 00:02:43 But we're going to talk about two CFR part 200. We're going to talk to you about the programmatic and fiscal monitoring definitions. We'll discuss kind of the, the issues with risk evaluation, how we at the department, assess risk, how we're mandated to do so by regulation. Talk to a talk to you about what that means for our grantee community, including our subrecipients. We'll discuss the use of kind of monitoring plans and monitoring protocols to help you have a methodical strategic, big picture overview of how you conduct your monitoring activities. We're going to identify some key resources, along the way, including some risk evaluation tools, some different monitoring protocols, some from, the, where we've, got some good information from your peers, at, other, state education agencies. So, it's going to be a fun-filled 90 minutes and to keep us going with that fun-filled spirit.

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Speaker 2 00:03:43 We'll go to the next slide. Silas. We want to make sure you have, you're, you're comfortable with using the chat, and we want to get you in the right frame of mind. So, before we get into the real substantive work, I want you to share using the chat, what is your guilty or guilty pleasure song? Now, a guilty pleasure song. It's a song. It might not be considered the most perfect song out there. It might not. Oh, well, that's, you know, that's just great music. It could be completely bubblegum pop. It could be whatever comes to mind, but it's a song that you can't help but sing to tap your foot. It puts you in a happy mood because monitoring should be a happy moment. Is that a little too cheesy? Sandy Monitoring's a happy moment? All right. You, you don't think so? All right, great. So put in the chat your guilty pleasure song. And as you're doing that, let's talk to our panelists today to see what would be a song that makes them kind of sing and dance. Sandy, what do you, what, what comes to mind for you? Well,

Speaker 3 00:04:47 The very first song that came to my mind was, Happy by Pharrell. Okay. I can't help it. Every time I hear that song, I have to sing along. You just can't stop yourself.

Speaker 2 00:05:01 I love it. I, I, I agree with you there. Melissa, we talked about the guilty pleasure, but I don't know if we talked about that we'd be sharing, but what's one that stands out to you?

Speaker 1 00:05:10 You know, the first thing that popped into my head was also the Happy song, but then the second one that popped into my head was, Michael Jackson's The Way You make me Feel. That song just makes me want to tap my foot, and it just makes me feel good. It's got a good beat. So, I, I dug that one.

Speaker 2 00:05:26 I love that. I love that. And Silas, you are here with us throughout this whole thing. We, you and I have already talked about Tea Selections beforehand. What's a song that puts a smile on your face?

Speaker 0 00:05:39 Oh, gosh, I didn't think of one. Now I'm on the spot. I'm

Speaker 2 00:05:43 Sorry. <laugh>,

Speaker 0 00:05:44 this is kind of nerdy, but I do, I, one of my favorite movies is the LEGO movie, so I like that. Everything is Awesome song. It's quite a bop to sing along to.

Speaker 2 00:05:56 I'm right there with you. That's a great one. As someone who loves toys and all, I think that's, yeah, I'm, I'm right there with you. For me, I'm going to go with a song. It's not that new, but it's newer than most of the music that I listened to. it's shut up and Dance with me. We, I heard it at a holiday party I was at back in December, had a blast dancing to it. Not that you were going to enjoy me dancing, and I promise I won't be doing that today. But nonetheless, those are some things there. It's like we've got a few folks there in the chat. I hope you're sharing with us. Break My Soul by, Beyonce. We saw a lot of good stuff there. Fantastic. And again, we just want to make sure to kind of put a smile on your face, get you excited to talk about how to better ensure the overall success and effectiveness of the grants that we're administering and the sub-recipients that you're working with. Christie, Lovely Day by Bill Withers. Oh, man, I love it. These are great to see these coming through. I hope that that puts you in the right frame of mind here as we go forward. Silas, next slide. And, and over to you, Sandy.

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Speaker 3 00:07:07 Well, we're here today with you to talk about monitoring and, you know, it's an important tool and we use it to assess performance. So, we want to make sure that grants are meeting their goals and objectives, in terms of complying with all the applicable statutes and regulations. So, we just want to make sure that grant funds are being used as they were intended. And that's when, grantees submitted. Well, I don't know if you could hear the, the thunder. it's really loud <laugh>. but we want to make sure that, grant funds are used as they were described in the original grant applications that were approved, and that everything's in compliance with the cross principles and the grant terms and conditions, that grantees, originally received, when they got those grant award notifications. monitoring also allows for timely identification of potential risks, and we'll talk more about what we mean by the word risk, performance and financial issues that may need some kind of mitigation strategies, and also, opportunity to provide technical assistance, to help with successful project outcomes. And back to you, David.

Speaker 2 00:08:27 Thank you. We'll go to the next slide, Silas. Absolutely. So, let's talk about some of the key aspects of effective Subrecipient monitoring. Now, we're going to talk to you about different modes of it and very formal, kind of established, times and opportunities to monitor. And we're going to focus on that. But I also want to give you this tidbit. Before we go too far. I want to challenge all of you, to look at monitoring in addition to these formal, very structured events, I want you to think of, remember this, every opportunity to interact with a Subrecipient and its data is an opportunity to monitor those, those organizations, those grant projects, to help them, be successful. And we pride ourselves here at the Department of Education that as we, we work with our grantees, that we emphasize that it is a partnership.

Speaker 2 00:09:24 And as a partnership we have different roles, but shared goals, and we want to build that effective relationship with you, our grantees. And we certainly would encourage you to build that strong working relationship with your sub-recipients so that we can better have a, a sense of what's going on in terms of performance, meeting their goals and objectives. Where are we on the compliance side and meeting the requirements, meeting that all important phrase of substantial progress, with effective monitoring is also going to highlight and really utilize kind of a, a, that methodical approach, that using risk-based strategies to help assess how effective a grantee, is carrying out the grant, the performance and the compliance. Those pieces go hand in hand. You can't have one without the other. And a risk-based approach is going to give you a, a systematic way of identifying issues and looking to try and mitigate those issues as we go.

Speaker 2 00:10:24 we want to talk about, we want to identify any potential or actual weaknesses, and find the best ways to address them, before they become too severe, or if something is uncovered, we're going to work at identify that, and then try to, to get the grantee or the sub-grantee in this case back on track. And it's not all just about gotcha moments. In fact, again, as a part of a partnership here, and not everyone is going to fully believe this, but as the monitoring activities are done to help improve performance, we also want to make sure that we can identify where our grantees or sub-grantees in this case, are doing the job, right? Maybe they've got an innovative approach, a novel approach. They're just getting the job done. We want to be in a position to recognize and, and congratulate those organizations for what they're doing well and see to the extent possible how we could replicate that, across your grant, your, your Subrecipient community, and potentially, if they're doing something really good, maybe it would, it would be applicable across the entire pro program, working with folks all over the country.

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Speaker 2 00:11:38 And those are, those are other reasons why we'd want to, to have a, an effective Subrecipient monitoring strategy. Sandy.

Speaker 3 00:11:48 Yeah. next slide, please. Yeah. So, the uniform guidance, or two CFR 200, that's the code of Federal Regulations, it tells us that sub-recipient monitoring is required, and it's required, to make sure that, the sub-recipients are in compliance with laws, regs, and the terms and conditions of sub agreement, award sub-award agreements. So, we want to make sure that performance goals are achieved. And we do this by identifying areas of strength. And you have the citation there. You have the link in the slide, so you can go and read for yourself what exactly it says. But basically, we just want to make sure that all of the sub-awards are in compliance with what the law says and back to you.

Speaker 2 00:12:46 Absolutely. And one of the things here, just as we've included on this slide and throughout the presentation, the citation references, I'm sure you're already doing this, but we want to highlight it when we communicate with our grantees and grantees, communicate with sub-recipients, we want to properly cite the regulations and the program statute as we go. So, we're all on the same page. Part of good clear communication. Go to the next slide. And what's, what, what is monitored? What are we looking for here? Well, the financial side of things, spending the funds, the compliance side, the performance, of the project itself, meeting those goals and objectives, making sure that they're on track in terms of what they said to do a point of emphasis here. Folks, I would encourage you, our Office of the Inspector General has been reviewing this as well as our office of the Chief Data Officer. We want to make sure that Subrecipient data and in turn, grantee data is accurate, valid, and reliable. So, as you're working and, and, and, and monitoring the financial progress and the programmatic performance, you want to take a step back and say, are these numbers too good to be true? Do they make sense? Wait a minute. They, you know, say that they're working with 500, students, for example, on a particular project, but there's only 300 students at this particular school within this.

Speaker 3 00:14:24 Did David freeze?

Speaker 0 00:14:26 Looks like David may have had an internet blip. I'm sure he'll be back in just one moment. As soon as the internet resumes. Please stand by.

Speaker 3 00:14:33 Okay. Could be the storm. Oh, there he is. Okay.

Speaker 0 00:14:40 All right, David, I'm just going to turn

Speaker 2 00:14:41 Off,

Speaker 3 00:15:03 We can go ahead to the next slide, I think. Yeah, so, we were going to go ahead and talk about Subrecipient monitoring plans. And, if you all don't mind, you can tell me in the chat how many of you have developed and used a monitoring plan. go ahead and, and type in the chat, if you've developed and used a monitoring plan. Oh, Florida has, I see someone else has California, and I hope I'm not butchering your name. Riann, Rihanna Jones says, we have a pretty decent one, just completed spring visits. Colorado has a rash. Sheila Davis says we have, Colorado has a monitoring protocol, yes, for Colorado, New Jersey, South Carolina, New Hampshire, Alaska, which was Alexa. So, I think Alexa has one too. <laugh>, Virginia. So yeah, lots of, monitoring plans. So, if you want to go to the next slide.

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Speaker 3 00:16:28 So, so many of you already know what a sub-recipient, monitoring plan is. They're not actually required in the uniform guidance or two CFR 200, or in Edgar, but they may be required in a grant program statute or in the regulations, or we often say the regs. but they are useful in ensuring that the Subrecipient monitoring occurs in a structured manner or format, and they do serve as a guide, and a tool, for internal controls to make sure that the grantees, use, a, a certain approach to monitoring performance and fiscal, you know, what's happening in terms of financial management. So, the monitoring plans can help determine the scope, the type, and the frequency of monitoring the sub-recipients. And I'm not sure if David's back, but we can, go ahead to the next slide

Speaker 2 00:17:34 Here, or see me. Oh,

Speaker 3 00:17:36 Yes, we can see you.

Speaker 2 00:17:38 Alright, well, I apologize for the delays. The only thing that can shut me up is an internet connection problem. So, my apologies to everybody <laugh>. understand. So we're up here, Doug, to understanding Subrecipient monitoring plans. It's really important here for you to, to understand the, you know, which, which, tools you're going to be using at a given time, whether you're going to be looking to do, physically onsite, a virtual, site visit, typical desk monitoring. for those of you who have had experience in this, you know, there's nothing like being physically on site to see the, the actual work that's being done and be faced to face with folks. Obviously, COVID kind of, put that, kind of put that in mothballs a little bit. And certainly with, with budgets and challenges, even at the, the grantee level working with subrecipients, where typically those organizations are within driving range, it can still be tough and there's a lot of them. So, you've got to have a, a, a good strategy as to how you're going to cover those areas. Make sure that you're aware of the, the scope of the monitoring review. Is it comprehensive or targeted? You know, what, what is kind of the, the, the rationale in your, your monitoring strategy as to why you're going to, to work, you know, work with this organization and the frequency of the monitoring reviews. Back to you Sandy. A next slide.

Speaker 3 00:19:08 there can be some issues that arise, when you engage in monitoring. and those can have to do with what we call depth of dosage. So, in terms of monitoring expenditures of the sub-recipients, and in terms of availability of information on your grantee or subgrantee websites. So, trying to keep track of how much they spend and the information that they're sharing, publicly. Also, there may not be a formalized process to review the material in key documents. So, you might have to do some extra probing or prompting to get access to material that you need to make sure that they're staying on track and giving you the content that you need. Also, there may not be a formalized process to gather data or monitor findings from other state entities, where applicable. So, you may need to stay in constant contact. keep in touch, and try to find ways to get access to the information that you need, just to make sure that there're following, the right protocols, keeping on track and doing what they need to do. And back to you.

Speaker 2 00:20:30 Oh, thank you. And we'll go to the next slide everybody. and with the, with this, we want to make sure that with the monitoring plan, with their recommendations, ensure that the monitoring goals are aligned with the ED requirements. So, making sure that, and it, it's kind of an obvious thing, but we want to say it. Know your programs, understand the program statute and its requirements, the expectations, how the sub-recipients, in, in their plan of attack that things are properly aligned. Make sure that you're able to, to, to properly coordinate and understand what

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fiscal controls are in place. And then, in the, in the accounting procedures that the subrecipients are using. It's, we have to connect the value of the dollar with the activities. There has to be proper communication between the sub recipients, those that are carrying out the grant, as well as those that are drawing down funds and managing that.

Speaker 2 00:21:31 And of course, it comes back to effective regular communication with those sub recipients. And I would also say it's effective proper communication internally within the Subrecipient organization itself as well. So, you've got to have, you've got to make the time for regular communication. And it's also, I would say it's critical to foster a relationship and events like what we're doing with you today, this session, I'll knock on wood here with that. The hope is that it creates a, an environment where you know that the Department of Education is accessible for you. If you have questions, we want your sub-recipients to have that same sense of, oh, we've got an issue here, let's talk to the, to the SEA person there in California or Florida, or, or whichever state. Then we've got 58 attendees. So, all of you good folks from wherever you want to make sure that we're able to properly have this, opportunity for, for engagement and communication so that there are no misunderstandings from one of the things that we talk about with regular communication.

Speaker 2 00:22:41 We have a telephone call that's the easiest best way to communicate with someone outside of being in person. But what are we going to do after the phone call? We want to follow up in writing, we want to make sure that we are clearly understood what was expected of who, the timeframe for that, the citations that kind of govern what we can do and what we can't do, and why things are allowable or why things might be out of scope, et cetera. Have that clear communication. Follow up in writing and document your records as you go. We'll go to the next slide and turn things back. Sandy.

Speaker 3 00:23:18 Yeah, so we mentioned monitoring protocols a little bit, and on the next slide, we're going to explain a little bit more about what we mean by that. So, monitoring and protocols basically help in identifying and documenting the status of sub-recipients, programmatic and financial performance, while also helping you to document the compliance with the grant requirements. So, they're basically helpful tools that help you document, document, document, so that in the future, if your program officer ever says, well, did you try to follow up? Well, did you make sure you check back in? Well, what did you do to, you know, document that they did X and Y or Z? And, you know, did you follow up? We've seen this happen many, many times. And, at the program officer level, they are not really supposed to interact or engage with sub-recipients. That's up to you.

Speaker 3 00:24:16 But they can help you by looking at your monitoring protocols and giving you feedback. So, it's great when you can have these ready and your program officers can look at them and, you know, have a conversation about what they look like and, you know, see whether or not they may be, comprehensive enough, for example. So, they can be timelines and procedures for writing the monitoring reports. They can include a process for getting responses to a draft or a final monitoring report. They can be guidelines for when grantees will be required to develop a correct or implement a corrective action plan, which are not supposed to be punitive. They're supposed to be helpful. but often corrective action plans can have that air of being something that's bad, but it's really supposed to help you get back on track and help a sub-recipient, meet success.

Speaker 3 00:25:19 also they can be used as a process for reviewing and approving corrective action plans. and also, protocols can be a process for following up on the completion of corrective

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actions. Sometimes, a corrective action plan is put in place and then is kind of forgotten about, and you really have to make sure that you follow up and that those corrective actions are enacted. Also, states may consider using the department's monitoring protocols as a framework for developing their own protocols. So, all of these protocols are in existence to help you, to help the sub-grantees. And it's all designed to make sure that those goals and objectives are completed and that everyone is in compliance. And Melissa, did you want to share anything?

Speaker 1 00:26:24 Yes, I do. And I think we can go to the next slide, please. And I'm going to go ahead and share a sample ESSER monitoring protocol, that we received when we were doing some monitoring ourselves here internally with the state, the office of state and grantee relations. Recently, I chose Kentucky's ARP ser monitor protocol with permission from Kentucky to share, to specifically show just an example of what a protocol could look like. and this is not to say that protocols have to look like this, exclusively. There are lots of different ways that protocols can look, and can be constructed. This is just an example to give you an idea of what we're talking about when we say a monitoring protocol. So, this is from Kentucky specific to their ARP ESSER, program. And the protocol starts off with a, a brief summary of the program where the regulations are and what specific programs they're looking at here.

Speaker 1 00:27:35 This particular protocol contains 20 indicators, and that may vary based on programmatic need. but Kentucky determined that 20 total indicators were necessary for this particular monitoring event. And their monitoring, as I scroll down, per there, their template provides instructions for districts to complete their self-assessment prior to the actual, onsite monitoring or the desktop review. However, the state is planning to monitor, but it gives a brief introduction or instructions for the districts and then dives right into the different indicators. And so, the fir the very first indicator they begin with here is, our best plans. How has your district engaged in meaningful consultation around these plans and things like that. And it offers an, an area of, an area for district response as well as suggested documentation. And I think it's important when developing a monitoring protocol to add additional guidance of suggested documentation so that your districts or your LEAs know what you're looking for.

Speaker 1 00:28:48 So are you looking for, meeting agendas? Are you looking for public comment comments or things like that? So, if you're looking for something very specific, I think it's helpful to put that in your template to make sure that states are providing you, or that districts are providing you with the information that you're, that you're actually looking for. And, and it just, lessons the confusion around what information you're, you're looking for and what you receive. And so, walking through the protocol, they have programmatic indicators as well as fiscal indicators. And I, I just want to make sure that folks understand the difference between those two things. As mentioned earlier, by David and Sandy, we have the fiscal requirements, but we also have a responsibility to monitor, monitor the programmatic implementation and outcomes of these grant funds too.

Speaker 1 00:29:45 And so Kentucky does a really good job of breaking down the programmatic piece by talking about their, their state plan or their, their district plan for use, the use of ARP ESSER funds, but also, walking through how they, decided which strategies they were going to use in implementing their ARP funds. And again, they provide a suggested documentation, timeline plans, that show progress towards completion. some of the other indicators ask how they're spending their 20%, funds on learning loss, things like that to check in and see how they're meeting the

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requirements of the grant program, and specifically looking at what the outcomes are with these funds. And so, this is just a, a simple example of what a monitoring protocol could look like. And I just want to scroll down to their fiscal piece here too, to show you what some of their indicators look like here. And so, their first indicator for the fiscal section is to describe the fiscal management processes that your district uses to ensure that the funds are spent in a timely fashion with proper oversight. And as David stated, it's really important to, and, and Sandy stated as well, it's really important to document the regulations, the requirements, why are we asking for this information? And so, you can see that that information is directly linked here, so that as the district is considering its response, it can go back and look at what the requirements specifically indicate.

Speaker 1 00:31:21 They go on, with a number of other indicators, about contracts. How did they ensure that contracts were only awarded to responsible contractors? I know that we have Davis Bacon requirements that can be confusing, but also require monitoring. And so, things like that would be important to include in a protocol. And so, again, one of the things that I think is really helpful about this protocol is the required documentation that must be submitted and the suggested documentation that could be helpful. And again, that just goes back to that clear communication. And so, with that too, I, I just want folks to know that we are going to be sharing these resources when we post this presentation to our website. So, if you don't have direct access to say this Kentucky protocol right now, we will provide access to this as a supplemental documentation, once this is posted on our website, if that's helpful for folks.

Speaker 1 00:32:21 But, we also have, the district's, or I'm, I'm sorry, the department's protocols available on our website. And I pulled, just pulled this up here on my screen just so you can take a quick peek. This is what we use when we're monitoring, specifically for our ESSER programs. And you'll see that we have different sections here, and ours is set up just a little bit differently than what you saw with Kentucky, but the sentiment is the same. We want to know, answers to specific questions and get responses from our grantees. and this, these questions are really helpful for grantees to consider as you are developing your, your own Subrecipient monitoring protocols. And so, you might take a look at what we have available and use that as a framework to build off your own monitoring protocols related to, for example, the ESSER program. And so, these can be really helpful if you're, if you're looking to develop a really strong monitoring protocol. And again, this is linked in the presentation as well, so you'll be able to access this information that's on our website too. With that, I'm going to turn it back over to I believe David.

Speaker 2 00:33:41 Yes, thank you. And I really appreciate, you Melissa sharing this sample from, from one of the sess. We can all learn from one another, and we can kind of build on what they're doing, but it strikes a real point of emphasis here to me that to, to measure effectiveness, we have to have a, a proper roadmap. We have to know what success looks like, how do we define success? And coming up with the right questions to ask at the very beginning is critical. That doesn't mean that we can't evolve and change over time, we should, but having that clear sense of our direction helps us know whether or not we've been successful or not. We'll go to the next slide, and we're going to talk now about risk assessments or risk evaluation. We'll go to the next slide as well. And let's talk about monitoring and risk.

Speaker 2 00:34:33 Now, risk the formal definition. It's a measure of the potential inability to achieve the overall program objectives within the defined requirements related to cost, schedule,



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and legislative authority with the grant, with typical grant management practice, in other words, what's go, what could go wrong if something, if this does go wrong, how big a deal is it? What can we do to keep this from going wrong in the first place? Or if it does happen, how can we get back on track when it occurs? So, thinking about risk is a critical concept for proper grant management. And just as we would tell everyone in, in the grantee community and, and what we tell our, our own program staff, there is always an element of risk associated with any of our funding decisions. The only way that we have a risk-free project, a risk free Subrecipient, is not to make an award or a sub.

Speaker 2 00:35:36 And in case we have a 100% chance of not meeting a stated need in a community. So, we've got to find, we have to understand there will always be an element of risk, and we have to identify an acceptable, risk tolerance to where we are going to, dispense, distribute, harder earned taxpayer dollars. And when I say grant or sub-grant, that's a synonym for grant for, for taxpayer dollars. We've got to think about that and understand what was, what we can do here to minimize those issues. no doubt. And another important quick thing to note here is that risks evolve and change over time, as we're, as, as we look at this. So, in 20 18, 20 19, outside of the Department of Defense and maybe, the CDC, no one had a worldwide pandemic on their risk scorecard of what could like slow down or hold up a grant. Clearly today, everyone understands that those kind of issues that can kind of stop us in our track have to be considered one of the reasons why the ESSER program is, came to be, in fact. So, we have to understand that risks evolve and change over time, and that we have to work together to methodically identify these issues. And Sandy's going to go in a little bit more depth, on that risk cycle on the next slide, Sandy,

Speaker 3 00:37:12 Right? So, as David mentioned, this slide shows the risk assessment cycle. And, as he was saying, risk is a measure of the potential inability to achieve your objectives. and those could be related to cost, to schedule, to legislative authority, or even to grant management practice. So, risk could be associated with any of those. And the risk management cycle is basically a framework, so that you can continuously discover, analyze, act, and improve. And you really have to first start with identifying risk factors that are relevant for you and for your project. So, you want to think about all of the potential risks that are applicable and, you have to kind of consider internal and external risks. And when you think about assessment, you want to analyze all of the risks that are associated with your grant, and any of the risks that can occur during implementation.

Speaker 3 00:38:29 and assessing risk can happen with any number of tools. monitoring it, as we mentioned before, is super important. We use different tools within the, the department. One of those is single audits. Those are great tools for us. monitoring, really helps to make sure that grantees and sub-grantees stay on track. risk mitigation happens, when you consider different options. So, for example, if we see that a grantee was supposed to have completed an audit and didn't, we try to figure out, you know, what were the causes? How can we get that audit completed? You know, how can we get that grantee back on track that might happen, for your sub-grantee, you know, trying to figure out what was the reason the sub-grantee wasn't able to complete the audit, how can you get them to do so?

Speaker 3 00:39:31 so mitigating risk, has to do with trying to figure out the specific conditions that have come into play, you know, and then, you know, you'd want to try to figure out if there's high risk, you know, designating a sub-grantee, with that, high risk designation, you know, what are the conditions that are factoring in. when you think about, high risk and monitoring a high risk sub-

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grantee, you're going to think about, you know, what kind of extra steps need to come into play with monitoring and then coming back to the risk cycle, you know, evaluate the risk cycle itself, what tools are working or not working, what mitigation strategies are successful or not successful? Because you might need to make revisions in terms of your own approach with your sub-grantees. You know, maybe there's a strategy that needs to be revised, because it really wasn't helping you in terms of making sure your sub-grantees stayed on track.

Speaker 3 00:40:41 and, you know, what Melissa was showing is, is super helpful, in terms of the available tools from the department. But maybe there's something that you've found in your own daily practice that has really helped you, in addition to those. And so, you know, there's just, a lot of, there are a lot of tools in your own, tool chest, so to speak, and you need all of those combined, when working with your particular grantees. So, the risk assessment cycle is something that needs to be revisited constantly to make sure that you identify that you act and that you revisit. So super complex, but it can be really helpful.

Speaker 2 00:41:27 Alright, well, yeah, AB absolutely, I think this is, it's, this never-ending cycle. And that's something not to be burdened by, but it's to embrace it because things change and evolve over time. And our understanding does, that's an important part of good grantsmanship is being able to evaluate the risk of our grantees, or in your case, the subrecipients. Let's go to the next slide and as we do that, well, and again, when and why do we assess risk? Well, the quick answer is, well, we're told to, we have to by the regs. but it also, and I think as Sandy talked to in such a lovely way, explain that cycle, you see that it's just good common sense too. So, two CFR 202 0 6 mandates that federal agencies have to evaluate risk prior to putting out making awards. Anytime we put more money out on the street, we have got to, for our new or non-competing continuations, any supplemental awards on the discretionary side, we have to assess risk.

Speaker 2 00:42:28 And we're also going to be evaluating our formula, grantees as well. Now, on the formula side, it's generally speaking, it's more of a matter of when and not if we're making the grants. You understand that, with, with this work, but it, it, nevertheless, we need to assess where folks are at any given time and put them and the grant and the, and the grant projects itself in the best position to be successful. That will include the proper conditions and the mitigation strategies that we're looking to, to, to implement. It's going to influence certainly with this, the, it is going to have, it informs our grant funding decisions, but it also informs our monitoring strategies. and I think that's a, that's a very key point to note based on the challenges and issues that we've identified that helps determine the level of energy and effort and where we're prioritizing our efforts.

Speaker 2 00:43:29 Let's go to the next slide. We talked about this being a partnership and nothing more, I think illustrates that than the concept of risk evaluation and risk mitigation. It is a shared responsibility is a shared burden. You can see the citations here, 202 0 6, where we're mandated to evaluate to assess the risk. 202 0 8 is a menu of specific conditions, more on the compliance financial side, to improve, improve the grantee's, application, of the requirements. 202 0 8 gives you a, a lengthy menu of options to include. A key takeaway that I would urge you to, to look at just as we would, we share with our own program staff that we impose conditions, we do so in a strategic and thoughtful manner. They should be, the conditions we impose should be proportional and responsive to the identified risk. If it's a mild risk, why would we put someone on cash reimbursement or, route pay?

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Speaker 2 00:44:37 we, we want to be careful about that. If it's a performance issue, then imposing additional constraints on the money might not be the way to, to affect the change that we're looking for. So proportional and responsive, we can, as, as determined through, the risk evaluations, the grantee or performance, we can identify a project or an entity itself is high risk. We don't do that, in a cavalier fashion. It is an option for you to identify just as we can identify grantees as high risk. You as at the, at the grantee could identify subrecipients as a high-risk level as well. We don't do this in a cavalier fashion. It's a thoughtful, documented process, and there should always be a plan to get the grantee back on track, or in this case the Subrecipient back on track so that those conditions can be removed.

Speaker 2 00:45:41 Now, we don't just throw these conditions out there in an arbitrary fashion. So there, and certainly the, the, the more conditions or the more stringent conditions that's going, there's, there's going to be a reason and a justification for that. So, in some cases, with our high-risk grantees, there are systemic issues that are challenging and impacting the grantee performance. So, it, it might take a little bit of time to get those removed, but there should always be a path to removing these conditions, to removing the high-risk designations. Another thing, as I say, this is a shared responsibility. So as you, as you think about this, when we're looking to impose a condition on a, on a grant, let's say that it, you know, we're, we're having some concerns on performance and where the grantee is, is moving in terms of meeting its goals and objectives you make the determination that a Subrecipient in your case would need additional reporting.

Speaker 2 00:46:41 Well, again, this isn't done as a punitive measure, it's so that it gives us information as to how well that entity is doing. So, if they are to submit a report, guess what, it seems obvious, but we do want to say it. You have to read it. And you have to be thoughtful about that reading. If we're saying that we're going to deny them easy, quick access to drawing down funds, then we have to, they'll have a mechanism to request those funds. And the rationale, we'll have to review that. So, it's a shared responsibility, it's a shared burden. So, it's in everyone's best interest to get the, the organization back on track. And none of this is done in a punitive nature. Now, certainly these extra steps, the additional work or additional reporting or the additional technical assistance that might feel like extra, but it's not done in a punitive fashion, punitive is when the Department of Justice comes in.

Speaker 2 00:47:32 And we don't want that. This is all an effort just to get everyone back on track, meeting the goals and objectives, documenting and showing that we're using the funds, those hard-earned taxpayer dollars, the way that we've been entrusted to do so. You can see there the monitoring requirements, 203 28 and the remedies for non-compliance in 203 39. So those are some of the key sections. We invite you to review those in detail. And just as we saw in the, in the one, sample the monitoring protocol at the SEA level and what we've talked about, include those citations, in your work and as appropriate in your communications with the grantees and the sub-recipients. go to the next slide and back to you Sandy.

Speaker 3 00:48:24 Yeah, thank you. And, I would just add that it's great to have the citations as well in case you do have a sub-recipient who wants to know why, why do I have to do this? Why are you asking me to give you this extra stuff, this extra documentation? Why do I have to fill out these forms? Why? and you can say, well, according to, you know, this reg, or according to this statute, that's why, and you kind of, you're passing the book, but so to speak, but it is required. but in terms

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of the high risk, designation that we've talked about, these are some specific indicators that point to what that means. What is high risk or elevated risk? These are some of the clues. So missing reports, large available balances, and excessive drawdowns. that high rate of key personnel turnover.

Speaker 3 00:49:21 I used to see it when I was a program officer, and I'd get lots of bounce backs and emails and I'd think, oh, here we go. You know, someone left again. Yeah. project goals not being met. and often there's a relationship between money not being spent and activities not being completed. draw down adjustments, refunds, identical payments, all the same amount or all even, often you'll notice patterns or trends with the money, which tells you something is off, also inaccurate or missing reporting submissions. And then again, as I mentioned earlier, success, suspected missing audits. All of these can point to elevated risk and, having to go down the path of high risk, determination and possible conditions. And, with that, I'll pass it to Melissa.

Speaker 1 00:50:27 Thanks Sandy. And, so I wanted to share just a couple of examples, of what risk assessment tools look like in action, and also, kind of tie things back together with the monitoring plan that isn't required, by statute or regulation, but is really helpful when you're thinking about, how, how you're going to implement risk assessments and what your monitoring process is going to look like just to have a more organized, flow. And so, what you're seeing on the screen right now is with permission from, Washington dc specifically from their office of the state Superintendent of Education, they agreed to let me share this information. This here is a memo, which gives a little bit of an outline of their risk assessment process for this upcoming year. But I'm also going to take you to the, the link that's, that's hyperlinked here in just a moment to show you what their monitoring plan looks like, because I think it's a great example of an organized well thought out plan that, that can be helpful as you think through, you know, your plan or if, if you're thinking through revising or if you're missing something, or, you know, just having that peer-to-peer support I think is really important.

Speaker 1 00:51:53 So to start here though, the, the, the Ossie or the office of the State Superintendent of Education in dc, they have some indicators here that mirror some of what Sandy just told us about in terms of what might, indicate elevated risk. And so, this first example here is lapsing funds. did the LEA lapse ESSER two funds? If so, they're automatically going to be selected for monitoring. If they're not programmatically monitored within the last five years and meet two or more of the following criteria, then they'll be monitored. So, submitting more than 75% of its reimbursement requests in the last month of the fiscal year could be an indicator of elevated risk. They're not regularly drawing down their funds, as they should be. And, and that that can raise red flags. if the, the LEA has been open for fewer than five years, that could indicate elevated risk just in the sense of inexperience, right?

Speaker 1 00:53:01 If they don't have a lot of experience with grant funding, which could be an indicator for elevated risk and, and require a little bit more, monitoring and technical assistance to support that grantee or that sub-grantee. if they've had a school designated for school improvement in the accountability system, if they had total grant expenditures in the, the top 75th percentile, making it basically saying that the more money they get, the more monitoring they might require. and, and that's not un an unreasonable expectation. And then demonstrated issues with reporting as, as Sandy mentioned, you know, not getting reports on time, the quality, maybe there, you know,

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not having issues across multiple grant programs. And so, these are some really good indicators to, to really help a, a grantee understand the risk levels associated with each of its districts. And so, with that, I wanted to share with you the actual Subrecipient monitoring plan that was linked in DC's memo there.

Speaker 1 00:54:12 And this was a little dated. It's from 20 20, 20 21, but it still has a lot of really great information in it. and again, this is linked in the presentation, so you'll be able to access this when we have it posted. but basically, this plan gives a really good outline of their entire monitoring process. And so, it gives the sub-recipients an overview of what risk-based monitoring is, why it's required, and talks about, this, the particular monitoring overview. So what can they expect throughout this, this monitoring process? They go on to talk about determining participation and consolidated risk-based monitoring reviews, and they talk about their risk assessment. Now, they recently revised it, and that's why they had this memo that I shared with you, but this is what their old process looked like. And it's just really helpful to look through it and identify what it means to be low risk, what it means to be medium risk, and what it means to be high risk in this specific context of this grantee and their sub-recipients.

Speaker 1 00:55:19 And so their determination of low risk is being below the 25th percentile. Medium risk is if you're between the 25th and 75th percentile. And high risk is anything above that 75th percentile. And that's how they determine who is going to be monitored, let's say, in person more frequently, more intensively, versus who might have a desktop review or may not need to be monitored in that particular fiscal year. And so, based on these tier assignments, the SEA aligns its support and resources to the subrecipients level of need, focusing more intensely on those requiring greater support. And, and again, it's not punitive, it's supposed to be helpful. This is supposed to be a learning process to help folks get where they need to be, help districts get where they need to be with their grant management and implementation of their, their federal education programs.

Speaker 1 00:56:15 And so, they have a lot of, helpful graphics in there, in their plan that show, what the monitoring might look like based on your risk designation. They talk about the different steps of monitoring activities so that nobody's blindsided by, you know, the, the SEA asking for, certain information or what the process is going to look like. It's very clearly laid out in this plan. And then they give tips for preparing for monitoring. They have sample virtual monitoring, review notification letters. They have, tips to, to prepare for an onsite visit or a virtual visit or a desktop visit, and what to expect from each of those different types of monitoring situations. and then they have, sorry, I'm going to scroll down. Don't mean to make anybody dizzy by scrolling too quickly, but scrolling down. They have an appendix that has a lot of additional information about the programs that they're monitoring.

Speaker 1 00:57:28 And I will note that with, specifically with our covid relief programs, some SCAs opted to monitor those programs separately, and some SCAs opted to monitor those programs in a consolidated manner by folding the monitoring in with existing monitoring they were already doing for their other federal education programs, like their title programs or their IDEA programs and things like that. So, both are fine. both options are, are just as well, as each other that it's just a, a preference. And so, this, I just wanted to point out that the consolidated is, is an option and we didn't present a consolidated monitoring tool, but they are out there. There are lots of states

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that have done consolidated monitoring and folded there, ESSER gear and s programs into, the monitoring for their other federal education programs. And you could look at other s e's websites, lots of SCAs have their monitoring protocols, loaded onto their websites if you're looking for ideas or what that consolidated monitoring might look like versus that more programmatic or program and fiscal targeted monitoring for a specific program.

Speaker 1 00:58:43 So I just wanted to put that out there, so people are aware. Both options are, are good options, just based on the context of your specific situations in your state. But in this example, they're talking about consolidated monitoring, with a whole list of the programs that are included in that monitoring. And then they also, talk a little bit more about the risk categories, their methods and criteria, what it means to, to have these higher risk indicators like failure to draw down grant funds on time, having higher grant award totals and things of that nature. So very helpful information to have, and this is just a helpful guide for LEAs to have access to as they're preparing for, potential or upcoming monitoring. I think another part of this that's really helpful is having this timeline, having this monitoring cycle planned out in advance, not saying that it might not change based on, you know, exigent circumstances that might arise, but in general, having a plan in place will, will help keep things moving along.

Speaker 1 00:59:50 And so you can see here that their plan starts in December and moves through April, where they're conducting virtual monitoring. and then after that they would then, you know, take that information back, de decide, you know, what the results of that monitoring event are, and if there's going to be corrective actions or if there are no findings, you know, move through that process. But this gives a good indication of when they begin their monitoring process, their, their monitoring cycle, and then when it comes to an end. And so that's really helpful information for folks to have. And so, with that, again, this will be included in the presentation, so you'll have access to it. This is also already available on the district of Columbia's office of the state Superintendent of Education's website as well. I am going to hand it back over to, I believe Sandy yes, to continue the presentation.

Speaker 3 01:00:49 Great, thank you. And we can go to the next slide and one more. Yes. So, just bringing it back all together. and, just to reiterate, monitoring is not meant to be punitive at all. It's just an ongoing process to make sure that funds are used as intended and that everything is done in compliance with the cost principles and the grant terms and conditions. So, your monitoring plans basically help ensure that, you and your sub-grantees, make sure everything occurs in a structured manner and that the scope, the type, and the frequency, are all, aligned with what was originally approved in the grant applications or in the monitoring plans. that everything, is, in accordance with, risk assessment process that the monitoring protocols, have fiscal and programmatic indicators and risk assessments are basically identifying, assessing, and managing, impacts of risk. And we talked a little bit about what we mean by risk and the risk, cycle. And with that, I will pass it back to David.

Speaker 2 01:02:17 Thank you, Sandy. Yes, absolutely. A systematic, methodical approach to evaluating risk and making sure you are doing what you're assessing and evaluating whether or not your risk indicators are still meaningful for your program on a regular basis. Let's go to the next slide, and as we talk to you a little bit about resources, I want to, I want to, as we're going to have a time here to, to close up, we'll have, we'll take questions in the chat. I want you to put, what is your

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biggest risk concern when you think about Subrecipient monitoring? What is your biggest concern with or risk that you might have in terms of assessing those subrecipients? What are you most concerned about? We'll put that in the chat here. We'll look at that as we talk about some additional resources you have. Let's go to the next slide now at the Department of Education's website@ed.gov.

Speaker 2 01:03:16 And, we'll make sure that you've got a link there, but@ed.gov, you can just put in the search box grants training, and it's going to bring you to a page that has a listing of these trainings and others to help you. These are 45-to-60-minute, computer-based training courses on grant related topics that will help you in better administering your grants and monitoring your sub-recipients, including our own sub-recipient monitoring course. There, kind of in the middle of that listing, these class, these trainings are all 5 0 8 compliant. we are increasingly, working to have them translated into Spanish. I think the plan will eventually be to have other languages as appropriate, but we're trying to make this a tool that has, a great utility, across our grantee community. and we'd invite you and your team to review those, have a better sense of what's being asked in terms of cash management, allowable costs, internal controls. That is such a critical piece here when we're thinking about monitoring and assessing risk and looking at audits. It's about those checks and balances that it give us that reasonable assurance that a, that an organization can carry out its activities in an effective manner. 203 0 3, that important citation. We've got these trainings for you and, really invite you and your folks to review those and share those with your sub-recipients for their own professional development and growth as we go forward. Alright, go to the next slide, Sandy.

Speaker 3 01:05:01 Yep. And, here we have some, resources for you and you probably are already familiar with them. SAM is the system for award management, and this is where you can find information about pretty much any grant program. you would use the A LN, which is, the number that's associated with the grant program. The Evidence Act of 2018, basically is information about reporting and reporting requirements. USA spending, is, has to do with, if you look it up, you can, search by awards and get information about specific grant awards. And, basically has information about contracts, grants, loans, how much money was spent, information about the specific award and the activities. and then, the FADA has to do with how much money is spent on specific people, and executives making over a certain amount of money, for certain types of awards.

Speaker 3 01:06:32 David, correct me if I'm wrong on that one. And then, the FSRS, that's another website, that provides information, basically, reports on sub-award and executive compensation. So, you can look up the fada. Also, if you need any information, also associated, with USA spending, in general, has to do with transparency. So, for example, when I worked at another agency, I used to have to upload all of my award information into USA spending and little abstracts about all the activities that had been completed, annually, just for transparency's sake. so that it was all clear that the funds had been spent in accordance with what had been approved by taxpayers. and then for, non-pro procurement, debarment and suspension, you have the citation there, two CFR 200 part 180, you can see for more information. And with that, I'll pass it back to date. Well,

Speaker 2 01:08:05 And we say, I think it might be a good opportunity here. We've got some winning reminders. We'll go to that, that next slide please. And as we think about questions, we see

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some people already excited about the computer-based training, that indirect cost is available. Also, we have a whole training on FTA, so if you want to learn about that, with winning reminders, you want to establish that monitoring strategy that prioritizes mitigating the greatest risks and uncovering potential best practices. It's not all just about trying to find the problems that's important, but we also, just as we saw some great examples of what, our, our colleagues are doing out across the country, it's good to see what is do, what's going right, how are they doing things that we can kind of learn from and replicate. you want to, again, select the right mitigation strategies that are both proportional and responsive to the identified risk.

Speaker 2 01:09:04 We don't want to just throw the kitchen sink at an issue because that doesn't necessarily get the job done. We want to be thoughtful in this, and we also want to have, well, we're going to make the best decision that we can on the, with the information we have at that moment. Things can change. We, we can have a, our understanding of a situation can improve what we thought was a root cause. It's a symptom of a larger issue, so we need to do something else. So, gifts properly monitor and evaluate how things are going, but if you get new information and you say, you know what, we need to remove that condition and impose something else, don't be afraid to do that. make sure that also we, we said this earlier, but it's an important point to note critically evaluate the performance and financial records for valid, reliable, and accurate data.

Speaker 2 01:10:00 quality data is an important, point of emphasis here at the department, and we think that that can really give us a much better, more accurate situation of how those taxpayer dollars are, are being spent, and are things getting better based on those needs that we've identified? And we're, we're, we're, we're investing in, are we seeing an improvement in student performance, professional development of, of staff, those other things. And when in doubt, whenever you have questions, don't hesitate to contact your ED program person. They are listed on box three of the grand award notification or the GAN. Those are our, our key winning reminders for today's session. Melissa,

Speaker 1 01:10:50 I think that that does it for us for today. If we have any questions, I don't see any questions in the chat box, but we can give it a minute. If anybody has any questions, we're happy to take some time to answer those. So, if you have any questions, please feel free to put them in the chat. And also just wanted to note, that any of our grantees that have, FTA issues or, just any issues with the implementation or requirements of their COVID grants in, in particular with, with the state and grantee relations oversight, please contact your, your program officer through your state mailbox, and they can offer your assistance and technical, technical assistance that way. So, we encourage you to reach out to your state mailbox if you have any specific issues with your ESSER gear or E'S grants. I do see there's a question in the chat. What is the typical timeline for a corrective action plan?

Speaker 2 01:12:00 Well, that's, that's an excellent question. I mean, it, it is going to be, dependent upon the, the, the on the issue that needs to be identified. I think you need to have something that is, measurable. And so, let's say, let's give an example where the, the project was supposed, or the sub-project was supposed to recruit and retain, a hundred students. And they were to do that for the, you know, within the first six months. Well, six months have passed, and they don't have a hundred students, they only have 75. Well, why is there that 25-person gap? We want to talk first becomes the conversation, and then depending on the issues here, then we would



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say, well, we want you to put together a plan to recruit those additional 25 students. And we, and, and it might be a bit of a negotiation with the, with, in this case, the Subrecipient. So maybe it's 30 days, maybe it's 60 days. There's a lot of different factors that would go into it. You do want to give something time to see if it will, it'll work. You can't, can't just snap your fingers and, and be ready on that Sandy. Now you've had some more recent experience with programming, officer work that maybe you could shed some light there too.

Speaker 3 01:13:20 Yeah, I think it really is on a case-by-case basis. So, the, you really have to work with the individual entity to figure out what works best. So, you have, for example, there may be a situation where there was an audit and there were, findings. And so maybe the corrective action plan is tied to the audit. or it may be that, you know, there are conditions that are being identified for another reason. And so, the corrective action plan is not tied to the audit, but to something else. maybe it could be tied to drawdowns, or reporting issues. for example, I worked with grantees who had discrepancies in their data. And so, I found, you know, when I looked at, for example, what was in, reports from one year to the next, I saw discrepancies in the numbers.

Speaker 3 01:14:30 And so I would have to go back and say, could you show me how you did the math? Because my math, when I do it isn't working. And maybe if you walk me through, we could see how it makes sense. And so, when they did it, they saw it really wasn't working and they had to double check their numbers. And then, you know, we figured out there was just some record keeping that needed to be put in place. So corrective action really needs to be designed in accordance with whatever the situation requires. And so, the timeline is going to have to match whatever the context is, whatever the specific activities are. It could be as short as a few months, or it could be a year. it really shouldn't be, one size fits all, right? You know, and it should be with a goal that we want to ameliorate the situation as quickly as possible and in as beneficial a way as possible, you know, whatever we need to do to make the situation, to get it fixed.

Speaker 2 01:15:50 And I would say too, Sandy, as you were talking, the I love that collaborative piece. Well, show me this, have that conversation, but when it's something that it's, that is under or should be under their control, let's say, let's say record keeping. Mm-hmm, <affirmative>, let's say you, you did, you had a desk monitoring, a virtual meeting, maybe you're physically there on site and the, the, the financial records or the performance records were a little shoddy, which is something that they have direct control over. So, we might say, let me see something in 30 days. Yeah, I mean, there could be that immediate to see can we see an improvement? And, but again, the more difficult, more challenging thing, it might take more time, but we've got to then be measuring that to see if the, if we've identified the right problem and we've put forward the right strategy to get it fixed. And also it doesn't hurt to, to talk with a Subrecipient and say, well, this is a problem. We all agree it is. What do you think is a fair timeline too? Yeah, work with that negotiation. Most of our subrecipients, just like most of our grantees, are going to be really conscientious to want to do the right thing. They might not know how, they might not, there might be some struggles and some issues, but most folks want to do the right thing. At least that's, that's been our experience.

Speaker 3 01:17:10 Yeah. There's a comment in the chat and I was just also going to give another example. Yes, which has to do with indirect costs. So I've seen, multiple occasions where indirect costs were both incorrectly applied, and then, so the wrong rate was used and then it was applied

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incorrectly. And so that was also detected by looking at multiple documents. So, looking at the indirect cost rate agreement and then looking at the documentation, so looking across multiple documents to make sure the numbers were all the same, and then checking the math. So, then I would also have to go back and say, you know, I'm seeing different, math than, you know, what might make sense. but there's a, a comment in the chat, about what happens when something's already been implemented that's not in compliance, and you can't go back in time. I'm going to defer to Melissa there, but I was just going to say with the indirect cost rate example, it might not require a corrective action plan. It might just require a fix. You just need to fix it, you know, so you might not need a longer-term plan, you just need to like, we just need to get this fixed right now. But I'm going to pass it to Melissa to see, how you'd like to respond to this, chat.

Speaker 1 01:18:51 I, I appreciate that feedback. Sandy and I think that's really helpful. And I would just say again that it would really be on a case-by-case basis and that there is some flexibility that SCAs have in determining corrective actions. And so, I can't give, you know, broad guidance, but other, other than to say that it really needs to be considered on a case-by-case basis and what, what the finding was and what the appropriate corrective action would be and what that timeline might look like in collaboration with, with the LEA. So, with that, I don't see any other questions in the chat at this time.

Speaker 2 01:19:38 We go to the last slide and, as you have questions, your program person, Melissa and, and the others with, with this program, they're in the best position to answer your questions. And if there's, there's an issue that they need to huddle over, then they come to us and we go to our Office of General Counsel and we work to get you the, the answers that you need. So, we really appreciate all of you being here. And Melissa, thank you so much for the opportunity to, to, to speak with your, to your grantees and to partner with you and, and, and your colleagues. This has been a, a, a really rewarding 90 minutes or a little less than that, but a wonderful session. So, thank you for the opportunity

Speaker 1 01:20:17 And thank you Sandy and David for joining us today and collaborating on this presentation. I hope that the participants that engaged with us today, found this conversation to be helpful and that, it inspires them to go back and look at their monitoring processes and risk assessment and, and dive in and, and make sure that everything's going well there. And, again, to our grantees, if you have any questions, please direct them to your state mailbox and your program officer will be happy to work with you to get any answers to any more specific questions that you might have. Again, this presentation is going to be posted, so it'll probably take a couple of weeks to get it up on the website, but when it is posted, we will be sending, the link out via our SGR newsflash that goes out weekly on Mondays. and so, with that, again, we want to thank you. Thank you, Sandy, thank you David, for your expertise and your, your collaboration. And thank you all for attending and we'll see you next time. Take care, everybody.

Speaker 2 01:21:21 So long, everybody. Thank you.