MONITORING SITE VISITS AND DESK REVIEWS

Broadband Infrastructure Program (BIP), Connecting Minority Communities Pilot Program (CMC), Enabling Middle Mile Broadband Infrastructure Program (Middle Mile), and Tribal Broadband Connectivity Program (TBCP)

NTIA

DISCLAIMER

This presentation is for informational purposes only and is intended solely to assist recipients in better understanding the Federal Program and Federal Interest regulations required by National Telecommunication and Information Administration (NTIA). The guidance does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific application requirements set forth in the program's Notice of Funding Opportunity (NOFO).

In all cases, statutory and regulatory mandates, and the requirements set forth in the program's NOFO, shall prevail over any inconsistencies contained in the information presented.

Table of Contents

4 Introduction

7 Monitoring Activities

15 Corrective Courses of Action

18 Conclusion

NTIA

Introduction

Importance of Monitoring

Monitoring confers many benefits to recipients, including:

- Showcase of project successes
- Strong relationships with Federal Program Officers (FPOs) & Grants Specialists
- Knowledge about monitoring for recipients with subrecipients/vendors
- Early identification and mitigation potential waste, fraud, or abuse
- Grant file organization ahead of audit/closeout
- Determination of tailored Technical Assistance (TA)
- Understanding of process improvements and documentation of lessons learned
- Training in proper grants administration
- Assurance that the project is effectively meeting milestones

Monitoring Overview

Monitoring Activities

Monitoring Activities

Conference Calls

Report Review

Desk Review

Site Visits

Ongoing Technical Assistance

What to Expect with a Desk Review

Selection

FPOs notify grant recipients they were selected for a virtual desk review, confirm dates and personnel, and request documents

Documentation

Grant recipients complete and compile documentation to submit to the FPO

Review

FPO conducts virtual desk reviews with grant recipient, examining errors and omissions, and requesting corrections and follow up

Corrective Action

FPOs assign corrective actions for items that have not been or cannot be ameliorated

What to Expect with a Site Review

Selection

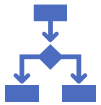
FPOs notify grant recipients of site visit selection and coordinate on a visit date/time, participants, and materials to submit.

Preparation

Recipients prepare the requested documentation, notify personnel who will need to attend, and prepare project sites to be visited and (if applicable) tests to be run at the project sites.

Assessment

FPOs meet with recipients, observe project site(s) and activities and review administrative, financial, and programmatic issues; documents; any required grant files; and any items from the preparation review for redress with the recipient.



Outcome

Site visit findings are documented, and any additional TA needs are identified. FPOs will follow-up with recipients and work to resolve NTIA enforcement actions to ensure compliance through the resolution of issues identified.

Common Triggering Events for Increased Monitoring

The Program and Grants Offices continue to evaluate areas where additional recipient monitoring and support is required due to the identification of triggering events. Examples of common triggering events include:

Projects Significantly Behind Schedule	Large Budget Changes Identified	Audit Findings	Key Personnel Changes
Projects that fall behind schedule may suggest improper management of Federal funds, misunderstanding requirements, or misaligned staffing.	Significant changes (10% or more) in budget line items can suggest deficient budgeting capability or indicate irregular expenditures.	Material audit findings suggest a lack of adequate financial management controls/processes necessary to prevent waste, fraud, and abuse.	Changes in two or more key personnel may suggest a changing management environment, which may enable waste, fraud, and abuse.

Other Triggering Events for Increased Monitoring

A recipient may require additional monitoring at any time throughout the life of the project. Other possible events that could also trigger a recommendation for increased monitoring include:

- Potential violation of Federal and State laws
- Reports of fraud, waste, or abuse
- Significant modifications in project activity
- Violation of financial compliance requirements
- Violation of performance compliance requirements
- Violation of award terms or Specific Award Conditions
- Excessive or significantly minimal drawdown of Federal funds
- Consistent report submission or completeness delinquency
- Application of a corrective action, such as a Performance Improvement Plan or Corrective Action Plan

Monitoring EHP Compliance

- While NTIA's initial award evaluation takes into consideration findings of the environmental review and the recipient's ability to overcome any environmental issues within the proposed budget and schedule, Federal Environmental Subject Matter Experts, with support from the Program and Grants Offices, will provide ongoing monitoring and oversight.

- This may include the review of reports related to EHP matters, support of regular standing conference calls, desk review and site visit support, and support of TA activities.

Audits and Audit Findings

Audit reports may provide additional information to be used in monitoring. Audit findings and associated plans for resolution may act as a trigger to reevaluate the monitoring assigned to a particular award.

- A non-federal entity that expends $750,000 or more during in the recipient's fiscal year in Federal awards must have a single or program-specific audit conducted (2 CFR § 200.501(a))
- Entities that are not subject to Subpart F of 2 C.F.R. Part 200 (e.g., commercial entities) that expend $750,000 or more in DOC funds during their fiscal year must submit to the Grants officer either a financial related audit of each DOC award or subaward OR a project specific audit for each award or subaward (DOC Standard Terms and Conditions § D(.01)(c))

Corrective Courses of Action

Corrective Courses of Action

- When performance issues are noted as a result of any of the monitoring activities, FPOs may, with appropriate Program Office and Grants Office involvement, specify that certain corrective courses of action be undertaken by the recipients to address the noted issues.
- Depending on the characteristics of a particular issue and recipient, several options are available for achieving performance improvement. Recipients should maintain all documentation demonstrating the completion of the corrective action.

Corrective Courses of Action

Immediate Action Letters

Performance Improvement Plans

Corrective Action Plans

Agency Review

Remedies for Non-Compliance
(see 2 C.F.R. § 200.339)

- Temporarily withhold cash payments
- Cost disallowances
- Whole or partial award suspension or termination
- Initiate suspension or debarment proceedings
- Withhold further Federal awards for the project/program
- Other legally available remedies

Award Terminations
(see 2 C.F.R. § 200.340)

Conclusion

What We've Covered

Monitoring is a standard function of grants management which allows the Program and Grants Offices to assist recipients with administering their awards using many different forms of communication, including conference calls, site visits, desk reviews, and regular report review.

Monitoring begins with an evaluation	FPOs and Grants Specialist review material with recipients	FPOs and Grants Specialists work with recipients to document successes and mitigate issues	FPOs adjust assistance throughout the grant lifecycle
Projects are evaluated by FPOs and Grants Specialists to determine monitoring needs.	Recipients submit documentation to the Program and Grants Office for FPOs and Grants Specialists to identify issues and any TA needs.	FPOs and Grants Specialists document lessons learned and successes and provide TA to mitigate issues. Corrective courses of actions may be identified.	FPOs assist recipients to successfully manage their award, adjusting assistance needs throughout the period of performance.

Q&A

Thank you!