

Writing a Monitoring Plan

VOCA Conference 2023

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Agenda



Plan Requirements

Risk Assessments
Frequency/Schedule



Best Practices

Staff Interviews
Facility Tour
Highlight Successes
Relationship Building



SAA Perspective

Arizona
Minnesota
Utah

Monitoring Requirements

VOCA Rule §94.106:

- Develop and implement a monitoring plan
 - Must include a risk assessment plan
- Conduct regular desk monitoring of all subrecipients
- Conduct onsite monitoring of all subrecipients at least once every two years
- Unless a different frequency is determined based on risk assessment
 - Identified in monitoring plan

§200.332 Requirements for pass-through entities:

- Written policies on subrecipient monitoring
- Review of financial and performance reports required by pass-through entity
- Follow-up to ensure timely and appropriate action is taken on any deficiencies pertaining to the federal award
- Issuance of management decisions for audit findings as required by 2 C.F.R. § 200.521

Monitoring Purpose

The purpose of subrecipient monitoring is:

- To ensure that the subaward is being used for the authorized purpose
- To ensure compliance within federal program, grant requirements, laws, and regulations
- To assist Subrecipients in achieving and documenting performance goals

Evaluate each subrecipient's risk of noncompliance in order to determine appropriate monitoring

- Consider imposing specific conditions

Verify subrecipients receive required audits

Monitoring Cycle



ASSESS



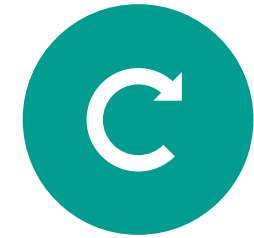
PLAN



REVIEW



DOCUMENT



UPDATE

Monitoring Activities



Risk Assessments



Desk reviews



Site Visits/Onsite monitoring



Documentation review

Monitoring Plan

Explain Risk Assessment

- Areas assessed
- Identify when assessments are completed
- Risk levels
- Monitoring of new subrecipients and/or programs

Schedule of monitoring activities and Onsite Reviews

- Frequency of monitoring
- Directly tied to your risk assessments

Required components of monitoring

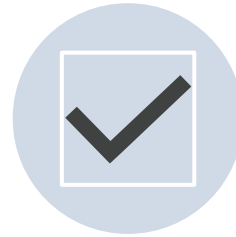
What to include in Monitoring Plan



TECHNICAL
ASSISTANCE



FINANCIAL
DOCUMENTATION
REVIEW



DESK REVIEWS



ONSITE
MONITORING



PERFORMANCE
MANAGEMENT

Monitoring Plan Documentation

Develop	Identify	Plan	Record	Allow
Every monitoring period	Monitoring activities by subrecipient <ul style="list-style-type: none">• Based on risk assessment	Indicate which quarter activity is to occur	When monitoring activity completed	For flexibility

Risk Assessment Requirement



MONITORING FREQUENCY IS
DETERMINED BY RISK
ASSESSMENTS



SAA MUST HAVE A FRAMEWORK
FOR EVALUATING RISK POSED
BY APPLICATIONS



SPECIAL CONDITIONS THAT
CORRESPOND TO THE DEGREE
OF RISK ASSESSED

Risk Assessment Best Practices



Identify the intent



Name the tool



Name the levels



Build in flexibility



Train staff for consistency



Subrecipients reflected in all levels

Risk Assessment Components

- ▶ Financial Stability
- ▶ Management Systems and Standards
- ▶ History of Performance
- ▶ Audit Reports and Findings
- ▶ Ability to Effectively Implement Requirements

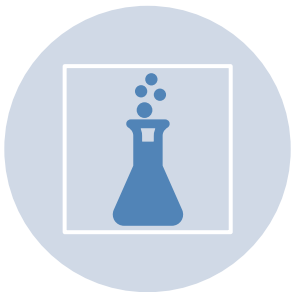
Risk Assessment Considerations



Does the metric make sense for your state?



How does the metric help assess monitoring needs?



Is the landscape of subrecipients different than prior assessment?



Is the metric objective?



Arizona



VOCA Funding Only



Monitoring Plan

Monitoring High Risk
Ongoing Financial
Oversight
Emergency Victim
Assistance Funds

Minnesota



Multiple Funding Sources

VOCA, VAWA, State



Monitoring Plan

More strict State regulations

Financial and Programmatic





Utah

VOCA, VAWA, SASP, and State Funding

Financial Desk Reviews

Onsite Reviews

- What is collected before?
- Relationship building

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Wrap-Up

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