

Frequenting Asked Questions for Policy 22 Monitoring Plan Submission

Question	Answer
How much information is enough? Will you notify us if we submit unnecessary information in our plan?	The purpose of the Monitoring Plan is to benefit agencies in planning monitoring activities. However, there are certain key elements that are required by Policy 22 to be included in agency Monitoring Plans. OCS is reviewing to determine if these key elements are included and compliant with Policy 22. When additional information is included it may take longer to review the plan for compliance. If additional information is included you will not be notified as such. If you are uncertain about including something please contact us for more information. Rule of Thumb: Don't include additional information unless there is some benefit to the agency monitoring staff or process.
If a monitoring approach has been adjusted during the monitoring year, is it necessary to have the plan approved again?	No. Monitoring Plans represent a "snapshot" of planned monitoring activities. If changes are made to the plan (i.e., subrecipients monitored, monitoring guides, etc.) post-approval it is the responsibility of the agency to ensure the monitoring process continues to comply with Policy 22. If you are unsure you may contact our office but it is not necessary.
If we are going to monitor all subrecipients do we still need to do a risk assessment?	Yes, this will help ensure that those with higher risk are pre-identified in case intervening factors (i.e., staffing shortages, etc.) prevent your agency from monitoring 100% of its subrecipient contracts. The agency may determine the criteria for determining risk, so in this case it may be fairly simple (i.e., based on dollar amounts). Be sure to state the criteria in the plan.
If subrecipients get less than \$20,000 and gets monitored by the state through an audit do they need to be monitored?	Points to remember: 1. Policy 22 at this time requires monitoring of at least 1/3 of subrecipients and 2/3 of the dollar amount of the total subrecipient population. 2. Monitoring includes a desk review which can be less involved than a visit.

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	<p>3. Thoughtfully assigning risk level can reduce the number of low risk subrecipients to monitor.</p> <p>4. The intent is to monitor contracts each fiscal year so any programmatic issues can be addressed timely. This ensures the programmatic goals are being met.</p> <p>5. What is considered a low dollar amount for one agency may be considered a large amount in another agency. Setting a threshold would be somewhat arbitrary and potentially defeat the purpose of the policy – to ensure programmatic goals are being met by subrecipients.</p>
<p>We are a small agency with limited staff dedicated to grant management. How do we assign monitoring tasks?</p>	<p>To the extent possible, those employees performing monitoring activities should be different than those with programmatic responsibilities.</p>
<p>Is the intent of Policy 22 to focus on individual contracts or individual subrecipients that may receive more than one contract?</p>	<p>The focus is on the individual contracts. A subrecipient could potentially be receiving grants under different programs. The intent is to help ensure that each program’s goals are met by the subrecipients receiving grant money from that program.</p>
<p>Do we need to include grant monies that have not been allocated to a subrecipient in the plan?</p>	<p>Funds that are not yet allocated at the time of plan submission do not necessarily have to be included in your Monitoring Plan. If / when the funds are ultimately allocated, the agency should check to ensure the 1/3, 2/3 requirement is still met given the increased Maximum Liability (\$\$) and Number of Contracts in their Subrecipient Population. If not, adjustments should be made.</p>
<p>Who has the responsibility to produce the annual monitoring plan, the agency that actually contracts with the subrecipient or the operating agency?</p>	<p>An agency’s plan should include all state and/or federal funds that it receives for distribution. You may contact our office if you are unsure of what to include in your plan.</p>
<p>Do we need to include the risk assessment template?</p>	<p>If the template you use is the same as the one in the monitoring manual you do not need to include it. However, please state in your plan this is what you use to assess risk. Anything different you would need to include. There is no need to include completed risk assessments for each of your grants.</p>

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If ARRA grants are monitored quarterly should we include that information?	Yes. They will be included in your population once and used to calculate the 1/3, 2/3 compliance. The monitoring frequency can be included in the narrative.