

**TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT**

ADULT EDUCATION MONITORING GUIDE

October 2015

Prepared by:

**TENNESSEE DEPARTMENT OF LABOR AND WORKFORCE
DEVELOPMENT**

**Division of Adult Education
Nashville, TN**



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Preface

This Monitoring Guide has been developed to provide a reference guide for statewide Adult Education (AE) monitoring activities. The information in this Guide is intended as a guide and does not limit the reviewers in number, scope, or format.

This Monitoring Guide contains the required Policy 2013-007 Central Procurement Office Grant Management & Sub recipient Monitoring Policy and Procedures elements which include: federal and state program descriptions of each program to be monitored; total sub recipient contract population; sub recipient contracts to be monitored; agency monitoring cycle; sample monitoring guides; risk assessment and assignment criteria; full-time equivalents and personnel classifications for staff dedicated to monitoring activities; summary of findings; the grants monitoring process and explanation of agency's corrective action process.

In addition, this guide also includes EEO information; the monitoring process and the program requirements for the English Literacy/Civics Education (EL/Civics) grants.

I.INTRODUCTION

The Workforce Investment Act places primary emphasis on program performance at the state and local area levels. Monitoring at state and local area levels will ensure that proper systems are in place, are being followed, and meet the requirements of the law. To accomplish this, the state has prepared this Monitoring Guide, which includes the onsite and desktop monitoring systems, corrective action, follow-up procedures and other items.

Grants awarded by Adult Education consist of, at present, cost-reimbursement and/or draw-down contracts awarded to Local School Systems (LEA), community base organizations (CBOs), community colleges (CC) and Tennessee Colleges of Applied Technology (TCATs).

The goals for the Division of Adult Education (DAE) monitoring are to:

- ensure that programs meet Adult Education and Family Literacy Act (AEFLA) requirements
- improve the quality of funded activities
- provide assistance in identifying and resolving accountability problems
- ensure the accuracy, validity, and reliability of data collection and data reporting as well as policies and procedures for program accountability

Purpose: Monitoring can serve many purposes. Although it is most common to monitor for compliance, monitoring should be viewed as a management activity used to insure compliance as it pertains to programmatic and fiscal policies. Monitoring is a process to insure that programs are adhering to policies, and provides technical assistance in deficient programmatic areas. This guide gives a review of the monitoring process used for Adult Education programs as conducted by the Tennessee Department of Labor & Workforce Development: Division of Adult Education.

Monitoring visits are conducted statewide in accordance with each program's policies regarding agreements, responsibilities, and activities. The Division of Adult

Education's Program Monitor or Designee will conduct sub recipient monitoring reviews of Adult Education (AE) contractors. All sub recipients will be monitored with a desk-top review annually. All sub recipients will receive a comprehensive on-site review once every three years.

To conduct a thorough review, the Monitor will examine both the fiscal and programmatic elements of the fiscal agent receiving Adult Education funding. This updated Guide should be used to review the fiscal agent's implementation of policies and guidelines to insure compliance and satisfactory program performance.

II. Policy 2013-007 Requirements

Pursuant to the Central Procurement Office Policy 2013-007, a monitoring plan is required to have specific elements incorporated into its design. The elements that follow in this section will give the monitoring process as well as the population to be monitored, and will act as guidance for monitors and programs for the monitoring process.

A. **Grant Monitoring Process**

i. **Plan Approval**

- The Tennessee Department of Labor and Workforce Development (TDLWD), Division of Adult Education Monitor will use the monitoring guide to conduct fiscal and program reviews. The guide will be amended as regulatory changes occur.
- The Program Monitor will update the department's Monitoring Review Guide based on Central Procurement Office guidelines and policy 2013-007 requirements which include lists of contracts, a risk assessment chart, and fiscal and program questionnaires for all AE programs.
- The Program Monitor forwards the updated Monitoring Review Guide with a letter to General Services by October 1st of each year. Negotiations will take place until the Monitoring Guide is formally approved.
- Once the Monitoring Review Guide is approved by General Services, a copy is provided to the Communications Division to be placed on TDLWD's web site.

ii. **Notification Process**

- The Monitor will provide written notice to each entity being monitored thirty (30) days prior to a visit. The written notice will inform the entity of the dates for review, the programs that will be

reviewed, the contract numbers that will be examined, and the estimated time of arrival.

- If the date(s) identified in the written notification is not convenient for the entity being monitored, the entity must contact the Monitor immediately. The entity and the Program Monitor will determine a mutually-satisfactory date, and the review will be rescheduled.
- The review may be conducted through desktop evaluation, onsite evaluation or through a combination of these two processes.
- The Monitor is authorized to examine program records, question employees, interview participants, and enter any site or premise which receives Adult Education funds.
- Random sampling techniques will be used to perform the review of program records.
- The Monitor will hold an exit conference with appropriate officials for each review conducted.
- After the Monitor finishes the review, working papers shall be established during the review and maintained by the TDLWD.

iii. Time Schedules

- **Monitor Report** A monitoring report indicating noteworthy practices, non-compliance and corrective actions as well as recommendations for improvement is issued within fifteen (15) working days of the completion of the monitor working papers.
- **Corrective Action** A corrective action plan (CAP) will be submitted within 30 (thirty) calendar days of the publishing of monitoring report that requires corrective action.

- **Progress Report** A progress report will be issued to TDLWD as directed by the Monitor until the corrective action has been accomplished.
- **Letter of Resolution** A letter of resolution will be sent to the provider stating that all actions have been taken and the CAP is closed.

B. TOTAL SUB RECIPIENT CONTRACT POPULATION

The Division of Adult Education has forty-two (42) sub recipient contracts that provide services for specified areas defined by counties. The sub recipient contracts are provided as follows:

SDA	AE Program Name	Counties Served	AE Contact	Phone	Address	City	Zip
7	Tennessee College of Applied Technology-Oneida	Anderson Union Campbell Scott Morgan	Amanda Evans	423-663-4900	355 Scott High Drive	Huntsville	3775 6- 4149
24	Bedford County Schools	Bedford Coffee Warren	Linda Maddox cell 931-625-6494	931-684-8635	326 East Depot Street	Shelbyville	3716 0
12	Blount County Schools	Blount	Carol Ergenbright	865-982-8998	1500 Jett Road	Maryville	3780 3
16	Bradley County Schools	Bradley Polk	Zoe Renfro	423-473-8473	1450 Strawberry Lane	Cleveland	3731 1
17	Chattanooga State Community College	Hamilton	Suzanne Elston	423-697-2529 423-697-3364	4501 Amnicola Highway	Chattanooga	3740 6

33	Dickson County Schools	Dickson Houston Humphreys Stewart	Phyllis Bradley	615-446-2114 615-446-7571x 20197 1-855-751-8215	220 McLemore Street	Dickson	3705 5
8	Tennessee College of Applied Technology-Morristown	Grainger Hamblen Claiborne	Susan Gratz	423-586-5771	821 West Louise Avenue	Morristown	3781 3
39	Dyersburg State Community College	Dyer Gibson	Elizabeth Feith	731-286-3231 731-286-3346	401 Country Club Road	Dyersburg	3802 4
18	East Tennessee Human Resource Agency, Inc. (ETHRA)	Cumberland Bledsoe Van Buren White	Pam Stubbs	931-484-5446 1-855-484-5446	60 Ridley Street, STE 108	Crossville	3855 5
19	Fentress County Schools	Fentress Clay Jackson Overton Pickett	Gertie Campbell	931-879-3802	1011 Old Hwy 127 South	Jamestown	3855 6
5	Greeneville City Schools	Greene	Kim Gass	423-638-2512	318 Tusculum Blvd.	Greeneville	3774 5

3	Hawkins County Schools	Hawkins Hancock	Lisa Barton	423-272-8345 1-866-977-8345	200 North Depot Street	Rogersville	37857
36	Henderson County Schools	Henderson Chester Decatur	Stewart Stanfill	731-968-1200 1-855-569-1200	293 North Broad Street	Lexington	38351
37	Henry County Schools	Henry Benton Carroll	Donna Winders	731-642-8655 x 101	55 Jones Bend Road, Ext.	Paris	38242
34	Hickman County Schools	Hickman Lewis Perry	Mike Brown Melody Skelton	931-729-5406	1675 Bulldog Boulevard	Centerville	37033
44	HopeWorks, Inc.	Shelby	Anna Snickenberg e	901-396-8800 901-272-3700	1930 Union Avenue	Memphis	38104
EL/ Civi cs ONL Y	Institute for Educational Volunteer Programs	Davidson	Don Cash	615-430-4381	816 Alex Way	Mount Juliet	37122
9	Jefferson County Schools	Jefferson Cocke	Carol Clamon	865-397-9385 1-855-357-0010	201 West Dumplin Valley Road	Jefferson City	37760

4	Johnson City Schools	Washington Unicoi	David Egbert	423-434-0206 x502	603 Bert Street-Box 13, Room 7	Johnson City	3760 1
1	Johnson County Schools	Johnson Carter	Carol Russom	423-727-2654	211 North Church Street	Mountain City	3768 3
2	Kingsport City Schools	Sullivan	Deborah Tabor	423-378-8407	222 West Main Street	Kingsport	3766 0
10	Knox County Schools	Knox	Nancy Seely	865-525-4962 865-525-4983	3001 Knoxville Center Drive Ste 2299	Knoxville	3792 4
27	Lawrence County Schools	Lawrence Giles	Ron Stepp	931-762-5251	610 Mahr Avenue	Lawrenceb urg	3846 4
15	Lenoir City Schools	Loudon Monroe Roane	Susan Williamson	865-988-0967	2145 Harrison Avenue	Lenoir City	3777 1
26	Lincoln Co. Literacy Council	Lincoln Franklin Moore	Teresa Smith	931-438-0555 931-438-0522 1-855-344-4723	1600-A Wilson Parkway (Lincoln) 303 Montgomery St.,Cowan,TN (Franklin)	Fayetteville	3733 4
32	Montgomery County Schools	Montgome ry	Betty Cook	931-542-5040	430 Greenwood Avenue	Clarksville	3704 0

22	Putnam County Schools	Putnam Dekalb	Lynda Breeden	931-528-8685	286 East Main Street	Algood	38506
23	Rutherford County Schools	Rutherford Cannon	Joan DeLisle	615-896-0876	2240-B Southpark Boulevard	Murfreesboro	37128
25	Sequatchie County Schools	Sequatchie Grundy Marion	Charlotte Cain	423-949-5307 423-664-2006	P.O. Box 488	Dunlap	37327
11	Sevier County Schools	Sevier	Matt Evans	865-429-5243	226 Cedar Street	Sevierville	37862
43 AE & EL/ Civics	Shelby County Schools	Shelby	Dr. Sonya Willias	901-416-4840 901-416-4875	703 South Greer	Memphis	38111
28	South Central Tennessee Workforce Alliance	Maury Marshall Williamson	Marcey Taylor	931-626-4149	#8 Public Square, 2nd Floor	Columbia	38401
14	Tennessee College of Applied Technology-Athens	McMinn Meigs Rhea	Leslie Travis cell: 423-208-5793	423-744-2814	1635 Vo-Tech Drive mailing: P.O. Box 848 (37371-0848)	Athens	37303
40	Tennessee College of Applied Technology-Jackson	Madison Crockett Haywood	Rebekah White-Williams	731-424-0691 x107	2468 Technology Center Drive	Jackson	38301

29	Tennessee College of Applied Technology- Nashville	Davidson	Susan Cowden Direct: 615-425-5609 cell: 615-946-0951	615-425-5579 615-425-5544	100 White Bridge Road	Nashville	3720 9
42	Tennessee College of Applied Technology- Ripley	Lauderdale Tipton	Yvette Dixon	731-635-3368 1-844-866-7047	127 North Industrial Drive	Ripley	3806 3
41	Tennessee College of Applied Technology- Whiteville	Hardeman Fayette	Thomas Leach	731-254-8521	1685 Highway 64	Whiteville	3807 5
20	Volunteer State Community College	Sumner Macon	Franklin "Dee" Johnson	615-230-3622 1-888-335-8722 x3621	1480 Nashville Pike	Gallatin	3706 6
35	Wayne County Schools	Wayne McNairy Hardin		931-722-3548	419 South Main Street P.O. Box 658	Waynesboro	3848 5
38	Weakley County Schools	Weakley Lake Obion	Shirley Callis	731-364-5481 731-364-3580	8250 Highway 22	Dresden	3822 5
21	Wilson County Schools	Wilson Smith Trousdale	Betty Byrd	615-443-8731	107 North Greenwood	Lebanon	3708 7

31	Workforce Essentials, Inc.	Robertson Cheatham	Freda Herndon	615-382- 7323	523 Madison Street-Suite A	Clarksville	3704 0
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C. MONITORING CYCLE & GUIDE

Sub recipients will be monitored, at a minimum, once every three (3) years, depending on their risk assessments. The monitoring cycle will begin after the Monitoring Guide is approved for the State fiscal year starting October 1st. The Monitor will schedule programs to be monitored for that fiscal year at his/her discretion with priority given to programs identified as a level one (1) risk.

D. SUB RECIPIENT CONTRACTS TO BE MONITORED

Sub recipient contracts will be monitored based on the risk assessment designated to the program. Programs assessed at a level one (1) risk, will be the first contracts to be monitored. Upon monitoring all programs at risk level one (1), risk level two (2) programs will be monitored, followed by risk level three (3).

E. STATE AND FEDERAL PROGRAM DESCRIPTIONS

The purpose of Adult Education services, as set out in 29 U.S.C. §3271, is to act as “a partnership among the Federal Government, States, and localities to provide, on a voluntary basis, adult education and literacy activities.”

- i. **Adult Education-** “Academic instruction and education services below the postsecondary level that increase an individual’s ability to read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; transition to postsecondary education and training; and obtain employment. (29 U.S. Code § 3272(1)(A)(B)(C)).

- a. **Adult Program Eligibility**

- The following is a description of eligible adults in the State of Tennessee. Individuals must meet the following criteria:

- Adults eligible for services with adult education funding include individuals who are at least 17 years of age (16 if emancipated) who are not enrolled or required to be enrolled in secondary school under state law, and; who are basic skills deficient; do not have a secondary school diploma or its recognized equivalent, or; are unable to speak, read, or write the English language.

- b. **Adult Eligibility Documentation**

- The Program Monitor should ensure that eligibility is verified. The allowable use of funds is determined by the eligibility criteria for each specific program

or funding stream, and the individual's needs. The following is a list of basic adult education-program eligibility requirements:

- i. If under age 18, documentation from the Director of Schools giving his/her recommendation that the individual attend a High School Equivalency preparation program, and
- ii. Driver's License or other state approved picture ID

ii. English Language Acquisition Program- a program of instruction designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language; and that leads to attainment of a secondary school diploma or its recognized equivalent; and transition to postsecondary education and training; or employment. (29 U.S. Code § 3272(6)(A)(B)(i)(I)(II)(ii)).

iii. Adult Program Outcomes and Reporting

The state plan, as well as each AE program plan, includes information regarding goals for each performance measure and how services will be provided to achieve successful outcomes for each measure. Monitoring will include review of services to insure that the sub recipients are providing sufficient services to meet the State performance measures.

Five (5) required performance measures apply to adult education programs for reporting outcomes:

1. Entry into unsubsidized employment
2. Retention in unsubsidized employment nine months after entry into employment
3. Attainment of a high school equivalency diploma
4. Enrollment in post-secondary education or approved training program
5. Increase in basic literacy skill levels in reading, writing, and speaking the English language, numeracy, problem solving, English language acquisition, and other literacy skills.

iv. Adult Education and English Language Acquisition Funding

Under 29 U.S.C. §3323 a provider shall not use less than 95% for carrying out adult education and literacy activities, and the remaining amount, not to exceed 5%, shall be used for the administration Adult Education services.

Fiscal monitoring activities may include but are not limited to:

1. Budget methodologies
2. Cash management practices
3. Cost allocation plans and processes
4. Cash disbursement compliance and documentation
5. Program income identification and reporting
6. Internal controls
7. Purchasing and procurement processes and procedures
8. Property accountability and safeguarding

Allowable Costs

Funds for Adult Education programs are intended for direct services to individuals. Allowable expenditures under this application for funding include:

- **Supervision**
- **Instruction**
- **Paraprofessional/Clerical**
- **Staff Development**
- **Materials, Supplies, and Equipment/Assets**
- **Travel**

Fiscal Reporting

- Budget revisions need to be made whenever increases or decreases are approved.
- A monthly Reimbursement Report is due for each contract by the 15th of the following month.
- A close-out package is to be completed for each contract and is due 45 (forty-five) days after the end of the contract period.

v. Non-Discrimination

The Department of Labor and Workforce Development, State, Division of Adult Education and all sub recipients are committed to full compliance with the following nondiscrimination and equal opportunity laws and implementing regulations:

- Civil Rights Act of 1964
- Rehabilitation Act of 1973, Section 504
- Americans with Disabilities Act of 1990
- Title IX of the Education Amendments of 1972
- Age Discrimination Act of 1965
- The regulations implementing the statutory provisions

vi. Non-discrimination Information and Reporting Requirements

The documentation and other compliance measures required for compliance with nondiscrimination statues and regulations, include a nondiscrimination provision.

Sub recipients must provide initial and continuing notice that they do not discriminate on any prohibited ground. This notice must be posted in a place visible to: (1) Registrants, applicants, and eligible applicants; (2) Participants; (3) Applicants for employment and employees; (4) and, Members of the public, including those with impaired vision or hearing, (b) As provided in Sec. 37.9, the sub recipient must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others. All notices must contain the specific language indicated below.

vii. Equal Opportunity Is the Law

It is against the law for this recipient of Federal financial assistance to discriminate the following bases against any individual in the United States: on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and against any beneficiary of programs financially assisted under Title II of WIA of 1998 on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIA Title II-financially assisted program or activity. The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access to any WIA Title II financially-assisted program or activity; providing opportunities in, or treating any person with regard to such a program or activities or making employment decisions in the administration of, or in connection with, such a program or **activity** (29 CFR 37.29).

F. SAMPLE MONITORING GUIDES

The Monitor will have in their possession during the monitoiring visit monitoring guides for Fiscal, Program, and Equal Opportunity. Using the guides, the monitor will be able to successfully conduct a sound monitoring of the programs, insuring compliance.

Sub recipient: _____

Reviewer: _____ **Date of review:** _____

Executive Director Signature: _____ **Fiscal Director Signature:**

Date: _____

Date: _____

YES = This question has been verified and agency has supporting documentations.

NO = This question has been verified, but agency has identified existing gaps. The agency will take steps to address internally, and/or will request technical assistance/instruction from state or applicable contact.

N/A = This question does not pertain to my agency/department/organization.

ADULT EDUCATION MONITORING TOOL
FISCAL QUESTIONNAIRE

	QUESTION	YES	NO	N/A	PARAMETERS
1.	Is a current, fully executed AE contract along with all amendments at the SDA administrative office?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if contracts are kept at the administrative office
2.	Were expenditures charged to contract prior to the contract beginning and/or after contract ending dates?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review beginning and end date to determine charges
3.	Does the agency have a method to ensure obligation on all contracts does not exceed availability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the procedure or any method SDA uses to prevent over-obligation of contracts
4.	Is there an official written policy for suspension and debarment that contains or references the federal requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the debarment and suspension policy if not, please check to see if any written document is provided to staff regarding this provision
5.	Are administrative costs applied according to AE guidelines per federal regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review administrative costs and how they are applied to each contract and determine if the costs are within the limits allowed

6.	Has agency sent an updated signatory form to AE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please verify and check signatories on file in AE fiscal office
7.	Were monthly invoices sent timely so that AE office receives by 15 th of each month?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check all invoices to determine date sent
8.	Is the general ledger or other reliable records the basis for fiscal documents?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review the documents used for reporting
9.	Are all purchases competitively bid, if applicable according to local policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review purchase orders and verify the existence of several suppliers
10.	Do supervisors review invoices to assure the accuracy and completeness including allowable/unallowable costs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if invoices were reviewed by AE supervisor
11.	Does supervisor review supporting documentation of allowable cost information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Consult with management team or responsible party for reviewing allowable costs as outlined in AE Administrator's Handbook
12.	Are all costs reasonable and necessary?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check invoices.
13.	Does the SDA serve an institutionalized population?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Verify with eCMATS and invoice reporting
14.	Does staff or administrators use logs to document long distance business calls?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check phone logs
15.	Is the SDA adhering to the state travel regulations when its employees are on business travel? Are mileage logs documented and payments based on business trips only?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check state travel policy and how the policy is followed and payments made
16.	If the SDA purchased equipment/assets costing \$100 and over did the SDA request approval for	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please see the approval and the request submitted to AE

	acquisition of equipment?				
17.	Is new equipment tagged and inventory taken?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the inventory list and see if it is updated to account for all new acquisition
18.	If equipment is missing, did the SDA report to authorities and inform State Office appropriately after becoming aware of missing equipment?				Please check to see the document submitted to local authorities and to State Office
19.	Is there a tracking system which reminds local staff when fiscal documents are due?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if there is a tracking system alerting staff of due reports
20.	Are time sheets maintained for SDA staff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review time sheets of SDA employees
21.	Is access to personnel files limited?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please consult administrative staff to identify employees given access to personnel files review
22.	Has agency been audited during the past two years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please refer to the audit report and the corrective action if any are on file with the administrative office
23.	If audited, have all audit reports been sent to AE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please cross-reference the SDA administrative office and AE for verification
24.	If indirect cost is charged to AE, is there an approved letter on file from the cognizant agency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please request letter of approval from administrative staff
25.	Can the program demonstrate that it keeps a separate funding trail for EL/Civics if applicable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check documentation for separation of AE and EL/Civics.
26.	Can the program demonstrate that activities supported by EL/Civics funds are attributable to EL/Civics only?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check payroll, class schedules, and other relevant documentation.

27.	If any employees split time charges across different programs, are they submitting time and effort sheets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review time and effort sheets if applicable.
28.	Are the 100% employees submitting a bi-annual statement to the State office certifying that they have spent 100% of time on AE activities as required by EDGAR?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check files in Division of Adult Education office.

Sub recipient: _____

Reviewer: _____ Date of review: _____

Executive Director Signature: _____ Fiscal Director Signature: _____

Date: _____

Date: _____

ADULT EDUCATION MONITORING TOOL
PROGRAM QUESTIONNAIRE

	QUESTION	YES	N O	N/A	PARAMETERS
1.	Has the date of birth been verified and documented as proof of eligibility?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check if any of these are kept in the file: Photocopies of Driver's License, State ID, Birth Certificate, U.S. Passport, Permanent/Alien Resident Card or other state approved Government issued photo id used to verify AGE
2.	Is the date of application documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Copy of eCMATs page which contains application date, as well as student hard copy file.
3.	Has an Individual Education Plan been developed after initial intake and assessment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IEP requires signature from participant and supervisor
4.	Has class attendance been properly documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Attendance Records
5.	Have case notes been created to demonstrate the progress of the participant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Case manager's notes providing evidence of participant's progress throughout services (includes hard file case notes)
6.	For files that eCMATS indicates supplemental data, is there an auditable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Documentation of employment verification for 1st, 2nd and 3rd quarters after exit, attainment

	record in the file?				of a diploma and/or placement in post-secondary or training
7.	Has the SDA keyed in all AE participants in eCMATs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check participants files and compare to information keyed in eCMATs
8.	Does the SDA have an employee who verifies data entered in eCMATs for accuracy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please interview data entry person and supervisor to verify accurate data entry
9.	Are program quality-control procedures performed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the program has staff (fiscal and other quality control staff) designated to ensure all program requirements are accurate
10.	If participant has gone inactive, missed class, or closed before completion, has appropriate follow-up been documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the case notes during follow-up
11.	Is there sufficient information recorded by staff to follow progress of a participant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the info or statements made by staff in eCMATs
12.	Have participants without activities for 90 (ninety) days exited out of eCMATs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the exit indication/or case notes
13.	Are there participants who are not exited out of the program/or after all activities closed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review Activities and students status within the system
14.	Are all the components in the participants file?				
	• Registration form	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	• Eligibility for enrollment (if applicable)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	• Media release form	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	score request form				
	<ul style="list-style-type: none"> • Student technology acceptable use policy agreement 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<ul style="list-style-type: none"> • For paper based test, locator with name and date on file 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<ul style="list-style-type: none"> • CASAS with name and date, individual profile with name, date, and instructor 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<ul style="list-style-type: none"> • Post-test Exemption form with all documentation (if applicable)(Depends on year being monitored; prior to 2015) 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<ul style="list-style-type: none"> • CASAS post-test with signature and date 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<ul style="list-style-type: none"> • OPT with name, date, and instructor (administered when student scored 7.0 in Reading on CASAS C+) 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<ul style="list-style-type: none"> • Additional post-test and profiles with name, date, and instructor 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<ul style="list-style-type: none"> • Documentation of accommodations for learning disabilities (if applicable) 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15.	Has Voucher usage been properly documented	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check CMATS against vouchers issued and used
16.	Was Voucher issuance pursuant to State Policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check student assessments and EFL
17.	Are HiSet Academy Seats being issued properly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check student application

18.	Does the program have sufficient staff, equipment, and materials to deliver Adult Education classes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Visual confirmation (note as an observation) Should be part of the desktop monitoring done before onsite
19.	Does the local program have the Tennessee Adult Education Supervisor's Handbook (Policy Manual), and copy of all contracts accessible?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Visual confirmation (please note as an observation)
20.	Is applicable staff provided with requirements and guidelines through orientation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if Tennessee Adult Education Supervisor's Handbook is onsite
21.	Is there a method in place to target those students most in need of services? (Assure that enrolled students meet the eligibility standards as set forth by the State).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review application for funding and eCMATS data.
22.	Is access to eligibility records limited to appropriate persons?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if the records of participants are kept in a safe place
23.	Is there an easily accessed copy of class schedules available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Visual check of class schedules
24.	Is there a file containing credentials of all instructors?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Verify transcript and waivers (if applicable) are in file: <ul style="list-style-type: none"> • Check that all teachers on payroll have a transcript/diploma on file
	If non-certificated, is there an approved waiver form of file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check for Waiver in Teacher File
25.	Do the brochures and other printed materials for the programs contain the TWLWD funding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A visual check of brochures and printed materials

	statement?				
26.	Does the program have documentation for all staff training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sign-in sheet and agenda for local staff development and documentation for state sponsored staff development for all staff
27.	Is the program using the Tennessee Adult Education Curriculum? (Jason, what needs to be placed here for curriculum?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check documentation including case notes of announced/unannounced observations, copies of class profiles, and assessments. Interview classroom teachers to assure alignment with curriculum
28.	Are all instructors integrating technology in their classrooms?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A visual check of digital education accounts and visual check of teacher's utilization of technology tools provided
29.	Does the program conduct a, minimum, eight (8) hour orientation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check the agenda for orientation
30.	Does the program have leveled classes scheduled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check a schedule of classes
31.	Are classes scheduled to meet student needs (e.g. night classes)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A visual check of class schedule
32.	Is there evidence that instructors monitor students and provide specific feedback?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check case notes of counseling students for progress and post-test; review CMATS case notes or hard file case notes
33.	Are supervisors monitoring their programs on a monthly, quarterly, and yearly basis insuring that policies are being followed by all staff members?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check documentation or NRS reports by individual county, tables 4 and 5 run by class, management reports, desktop monitoring, or other methods as provided
34.	Do supervisors assure that assessments are conducted and scored using testing protocol established in the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Appropriate paper work in student file, case notes/file notes for providing student feedback, a plan for retesting, a plan to assist with HSE

	federally-approved Assessment Policy?				registration; Has a proctor been provided for the assessment and attended the proper training, obtaining the CASAS certification
35.	Does the program market itself to the community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check recruitment plan documentation, partnerships, and networking in the community
36.	Does the supervisor evaluate teachers on student performance within classes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check evaluation documents.
	Does the supervisor use TEVAL for teacher evaluation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check TEVAL electronically
37.	Does the SDA/Program comply with data entry standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Compare student files with CMATS records to insure that all data is being entered in a timely manner (entered within 10 days).
	• Attendance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	• Test scores	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	• Labor force status	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	• One instructor assigned per class	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check class schedule and visual confirmation upon visiting class.
	• Limited manual exit of students	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	• Class creation by County and Student Enrollment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Student testing within the proper class hours according to Federal guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Minimum 40 hour attendance; Maximum 100 hour attendance	
38.	Is there an intake and orientation process for ESOL/Civics?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check intake/registration form and agenda.
39.	Are EL/Civics students	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check eCMATS against student

	categorized in eCMATS as EL/Civics?				file to ensure that student is being tracked under EL/Civics activity
40.	Is program implementing EL/Civics instruction as written in their proposal?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check Application for funding
41.	Is integrated Civics education the primary focus of the program's EL/Civics instruction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review
42.	Have all grant requirements been verified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please review grant contract, content, and actual services
43.	Is instruction of sufficient intensity and duration for participants to achieve substantial learning goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check class schedules Check student hours
44.	Does the program have an approved plan for distance learning?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check supporting documentation in attendance hours
45.	<ul style="list-style-type: none"> Does the program follow all test publisher guidelines when post testing students? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Student files and eCMATs records, Are students being pre-tested upon entry and post-tested when they reach a minimum of 40 hours attendance, not to exceed 100 hours
46.	Is the program on track to meet the state's performance on completions on Educational Functioning Levels (EFL) and outcome strategies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check Table 4

Sub recipient:

Reviewer: _____ **Date of review:**

Executive Director Signature: _____ **Fiscal Director Signature:**

Date: _____

Date:

ADULT EDUCATION MONITORING TOOL
PROGRAM QUESTIONNAIRE (EEO)

	QUESTION	YES	NO	N/ A	PARAMETERS
1.	Has the SDA provided reasonable accommodation for persons with disability? If not, see #16.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Verify for all sites included in sample
2.	Does the SDA provide initial and continuing notice, using the required nondiscrimination language that it does not discriminate on any prohibited ground?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Posters, broadcast, RFPs, closed caption, etc.
3.	Does the covered SDA have policies, procedures, and auxiliary aids and services in place which ensure the reasonable and necessary delivery of program services to	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review of policies and procedures, all media, including videos, DVDs, etc.

	qualified individuals who have physical and/or mental impairments?				
4.	Does the SDA have policies and procedures in place that ensure individuals with qualifying disabilities will be referred for auxiliary aids and services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review of policies and procedures
5.	Does the SDA post approved nondiscrimination and equal opportunity complaint procedures and contact information in:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review the signs posted in regards to EEO/ Non-Discrimination provisions
	<ul style="list-style-type: none"> Primary entrances 				
	<ul style="list-style-type: none"> Internal memoranda, hard copy and electronic 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	<ul style="list-style-type: none"> Handbooks or manuals 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Same as above
	Does the SDA's orientation and other presentations to new employees include a discussion of the nondiscrimination and equal opportunity provisions applicable to the program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review internal memorandum to staff; manual published regarding nondiscrimination/EEO and other related provisions to train new staff Visual confirmation
6.	Has the contract agency received any discrimination complaints last fiscal year or during the current contract year? Explain.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review of documents
7.	Are students with documented learning disabilities provided suitable accommodations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Check student file for documentation

8.	Does the SDA prohibit discrimination based on race, sex or, age in its employment practices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please check to see if EEO posters are displayed in the reception area of the SDA office, the career center or wherever WIA services are offered
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G. PERSONNEL INFORMATION REGARDING MONITORING STAFF

Monitoring will be conducted by a combination of employees for the Division of Adult Education. The monitoring team will consist of three (3) Education Consultants and the Director of Performance and Compliance. The personnel that will conduct the monitoring visits are listed as follow:

- Cynthia Carter, Regional Consultant for Middle Tennessee
- Janet Fricks, Regional Consultant for East Tennessee
- Glenda Vanderveer, Assistant Administrator, Interim Regional Consultant for West Tennessee
- Ian White, Director of Performance & Compliance

H. RISK ASSESSMENT AND RATINGS

Based on various factors (as listed below) sub recipients are given a risk assessment, and based on that assessment are given a rating. The rating score will identify those programs that have a higher risk of being out of compliance and will need to be monitored before others with a better risk rating. The risk ratings are as follow:

- 1= high risk and will be monitored year 1
- 2= moderate risk and will be monitored year 2
- 3= low risk and will be monitored year 3

Local programs have been identified for on-site monitoring visits through a risk analysis based on program risk factors including:

- Lack of on-site full monitoring review in last 3 (three) years
- Lower performance on CMATS indicators in several categories including low enrollment, movement through the levels, and HSE attainment
- Prospective non-compliance with grant requirements including late submission of reports and requests for reimbursement and requesting reimbursement for unallowable costs

- Prior findings and/or progress in resolving required actions from prior monitoring visits
- Recent change in program supervisor
- Change in provider

SDA	AE Program Name	Counties Served	Risk Assessment
7	Tennessee College of Applied Technology-Oneida	Anderson Union Campbell Scott Morgan	1
24	Bedford County Schools	Bedford Coffee Warren	3
12	Blount County Schools	Blount	3
16	Bradley County Schools	Bradley Polk	1
17	Chattanooga State Community College	Hamilton	1
33	Dickson County Schools	Dickson Houston Humphreys Stewart	1

8	Tennessee College of Applied Technology-Morristown	Grainger Hamblen Claiborne	1
39	Dyersburg State Community College	Dyer Gibson	1
18	East Tennessee Human Resource Agency, Inc. (ETHRA)	Cumberland Bledsoe Van Buren White	2
19	Fentress County Schools	Fentress Clay Jackson Overton Pickett	3
5	Greeneville City Schools	Greene	2
3	Hawkins County Schools	Hawkins Hancock	1
36	Henderson County Schools	Henderson Chester Decatur	2
37	Henry County Schools	Henry Benton Carroll	1
34	Hickman County Schools	Hickman Lewis Perry	1
44	HopeWorks, Inc.	Shelby	1
EL/ Civics ONLY	Institute for Educational Volunteer Programs	Davidson	2
9	Jefferson County Schools	Jefferson Cocke	3

4	Johnson City Schools	Washington Unicoi	3
1	Johnson County Schools	Johnson Carter	1
2	Kingsport City Schools	Sullivan	3
10	Knox County Schools	Knox	2
27	Lawrence County Schools	Lawrence Giles	1
15	Lenoir City Schools	Loudon Monroe Roane	1
26	Lincoln Co. Literacy Council	Lincoln Franklin Moore	2
32	Montgomery County Schools	Montgomer y	2
22	Putnam County Schools	Putnam DeKalb	3
23	Rutherford County Schools	Rutherford Cannon	1
25	Sequatchie County Schools	Sequatchie Grundy Marion	2
11	Sevier County Schools	Sevier	1
43 AE & EL/ Civics	Shelby County Schools	Shelby	1

28	South Central Tennessee Workforce Alliance	Maury Marshall Williamson	2
14	Tennessee College of Applied Technology- Athens	McMinn Meigs Rhea	2
40	Tennessee College of Applied Technology- Jackson	Madison Crockett Haywood	2
29	Tennessee College of Applied Technology- Nashville	Davidson	2
42	Tennessee College of Applied Technology- Ripley	Lauderdale Tipton	3
41	Tennessee College of Applied Technology- Whiteville	Hardeman Fayette	2
20	Volunteer State Community College	Sumner Macon	2
35	Wayne County Schools	Wayne McNairy Hardin	1
38	Weakley County Schools	Weakley Lake Obion	1
21	Wilson County Schools	Wilson Smith Trousdale	3
31	Workforce Essentials, Inc.	Robertson Cheatham	3

I. FINDINGS FROM PREVIOUS MONITIRNG CYCLE

During the previous monitoring cycle findings that took place were as follow:

- The late filing of invoices
- Improper tracking of inventory and tagging
- Improper tracking of time and effort for employees
- Proper documentation in student file was incomplete

J. CORRECTIVE ACTION PLAN PROCESS

After monitoring was completed and monitoring reports are issued, Corrective Action Plans are to be completed by the subrecipient who verifies that a plan and tracking process is in place to correct the findings. With each finding, evidence is required to be submitted by the sub recipient illustrating the process it is going through in order to correct findings. The time period for the corrective action is a three (3) month time period, where the sub recipients collect materials and evidence to supply to the State office. The three (3) month time period is determined by the monitor at the point the monitoring report is issued. The Corrective Action Plan is to be submitted fifteen (15) days after the end of the three month time period. The cover sheet/template for the Corrective Action Plan will accompany the materials and will be the notification of findings as each corrective action is completed.

TEMPLATE FOR PROGRAM AND TECHNICAL ASSISTANCE MONITORING CORRECTIVE ACTION PLAN

Program: _____ DATE OF VISIT: _____ RECEIVED REPORT: _____

Project Leads:

Description of Required Action Number and Tasks	Strategy to Meet Required Action	Evidence of Action Completed	Projected Date for Completion	Assigned Staff, if Appropriate	Status of Action Completed/Pending

Adult Education Monitoring Contacts:

Glenda Vanderveer, Assistant Administrator

Wanda Cameron, Director Fiscal Services

Ian White, Director Performance, Compliance

Phone (615) 253-5868

Fiscal Contact Information:

Wanda Cameron, Director Fiscal Services

Ian White, Director Performance & Compliance

Phone (615) 253-5868

Contract Office

, Contract Coordinator

, Accountant 3

Phone:

Program Monitor:

Ian White, Director Performance & Compliance

Phone:(615)253-5868

CROSS REFERENCE

(Note: OMB A-133 has a Supplement. This is updated yearly. All Grant recipients must comply with the new supplements. The Super-circular for Education will take effect on December 26, 2014)

	Requirement	Governmental Organizations	Nonprofit Organizations	Institutions of Higher Education
A.	Uniform Administrative Requirements	29 CFR Part 97	29 CFR Part 95	29 CFR Part 95
B.	Pre-Award Requirement/After the Award Requirement	29 CFR Part 97.10-12 29 CFR Part 97.50-52	29 CFR Part 95.10-17 29 CFR Part 95.70-73	29 CFR Part 95.10-17 29 CFR Part 95.70-73
C.	Period of Availability and Fund	29 CFR Part 97.23	29 CFR Part 95.28	29 CFR Part 95.28
D.	Procurement	29 CFR Part 97.36	29 CFR Part 95.40-48	29 CFR Part 95.40-48
E.	Allowable /Unallowable Costs	A-87 Attachment A 29 CFR Part 97.22	A-122 Att. A 29 CFR Part 95.27	A-21 Section C 29 CFR Part 95.27
F.	Allowable/Unallowable Activities	A-133	A-133	A-133
G.	Treatment of Selected Items of Cost	A-87 Attachment B	A-122 Attachment B	A-21 (J)
H.	Cash Management	29 CFR Part 97.20.21	29 CFR Part 95.20-23	29 CFR Part 95.20-23
I.	Program Income	29 CFR Part 97.25 EDGAR	29 CFR Part 95.24 EDGAR	29 CFR Part 95.24 EDGAR
J.	Equipment	29 CFR Part 97.32-33	29 CFR Part 95.34-36	29 CFR Part 95.34-36
K.	Matching, Level of Effort, Earmarking	29 CFR Part 97.24 EDGAR	29 CFR Part 95.20-23 EDGAR	29 CFR Part 95.20-23 EDGAR
L.	Real Property Acquisition and	29 CFR Part 97.31	29 CFR Part 95.30-37	29 CFR Part 95.30-37

	Relocation Assistance			
M.	Lobbying Restrictions	29 CFR Part 93	29 CFR Part 93	29 CFR Part 93
N.	Suspension and Debarment	29 CFR Part 98 (A-E) 29 CFR 97.35	29 CFR Part 98 (A-E) 29 CFR 95.13	29 CFR Part 98 (A-E) 29 CFR 95.13
O.	Eligibility	A-133	A-133	A-133
P.	Drug-Free Workplace	29 CFR Part 98 (F)	29 CFR Part 98 (F)	29 CFR Part 98 (F)
Q.	Non-Discrimination (Civil Rights)	29 CFR Part 31	29 CFR Part 31	29 CFR Part 31
R.	Non-Discrimination (Basis of Handicap)	29 CFR Part 32	29 CFR Part 32	29 CFR Part 32
S.	Age Discrimination of 1975	29 CFR Part 35	29 CFR Part 35	29 CFR Part 35
T.	EO Requirements (WIA only)	29 CFR Part 37	29 CFR Part 37	29 CFR Part 37
U.	Reporting	29 CFR Part 29 CFR Part 97.40-42 EDGAR	29 CFR Part 29 CFR Part 95.50-53 EDGAR	29 CFR Part 29 CFR Part 95.50-53 EDGAR
V.	Audit/Monitoring	29 CFR Part 99 EDGAR	29 CFR Part 99 29 CFR Part 95.5 EDGAR	29 CFR Part 99 29 CFR Part 95.5 EDGAR

State Web Sites

<http://www.tn.gov/labor-wfd/AE/index.shtml>

Federal Web Sites

<http://www2.ed.gov/about/offices/list/ovae/index.html>