National Criminal Justice Association

Homeland Security

Office of the Secretary
Preparedness Directorate
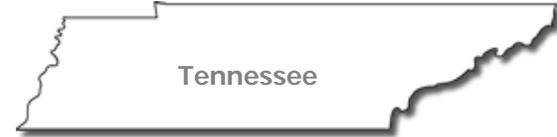**Office of Grants and Training**

PROMISING PRACTICES (4/8/06)

Topic Area: Program and Financial Monitoring

Tennessee

Audience: State Administrative Agencies

Description: The Tennessee Emergency Management Agency (TEMA) uses monitoring protocols that assist the SAA grant management staff in preparing for and conducting monitoring of subrecipients.   The attached documents include the monitoring protocols:

1) ODP (G&T) Monitoring
2) Public Assistance
3) Mitigation

The first protocol was developed specifically for monitoring of grants awarded to the state by the Office of Grants and Training (G&T), U.S. Department of Homeland Security (DHS). The last two protocols were developed to monitor specific programs awarded to TEMA by DHS' Federal Emergency Management Agency (FEMA). Although each monitoring protocol is tailored for a specific program, there are many similarities between the three which capture basic, important grants management information, regardless of program or funding source.   Consequently, monitoring protocols and practices from existing programs may be helpful in developing protocols and practices under the Homeland Security Grant Program and other initiatives awarded through G&T. These monitoring protocols are used during site visits conducted by TEMA. Prior to deployment, the TEMA grant monitor receives training on the specific protocol's policies, procedures and practices in order to effectively and efficiently conduct programmatic and financial on-site monitoring of subrecipients.

Unique or Special Statutes Involved: None

How long practiced: Since 2005

Jurisdiction: Statewide

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Finance and Programs
MONITORING GUIDE FOR OFFICE OF DOMESTIC PREPAREDNESS

Subrecipient:_____ **Program Monitor:**_____

Grant/Contract Number:_____ **Date of Visit**_____ **Fiscal Monitor:**_____

I. ACTIVITIES ALLOWED OR UNALLOWED		
REVIEW ITEM Be aware of large transfers of fund from program accounts which may have been used to fund allowable activity	**COMMENTS/WORK ODPPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work Paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. **Is the project being implemented as described on the ISIP/BSIR?**		
2. **Is the project on target and working toward the stated goal(s)?**		
3. **Provide a brief explanation.**		
4. **Identify project start date.**		
5. **Is the project funded by any other funds?**		
6. **What sources are utilized for Donated Resources / In-Kind match?** **Volunteer labor, donated equipment and donated materials** **Note: Page 41 for cost calculations**		
7. **Is the Administrative Allowance properly documented?** 8. **Are the Administrative allowance activities in compliance with the Manual?**		

Note: **Preview Administrative fees and duties.** **See Page A-2**		
9. **Have there been any changes in scope of the project or project spending?** 10. **If yes has the Project Manger been notified?** 11. **Are any changes in scope or costs projected?** 12.		
13. **How many progress reports have been submitted and dates?** 14. **How many should have been submitted and dates?**		

II. ALLOWABLE COSTS/COST PRINCIPLES		
REVIEW ITEM OMB Circular A-87 Cost Principles State and Local Govern. and A-122 NP	**COMMENTS/WORK ODPPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work ODPper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. **What services does the grant pay for?** 2. **View Contract, ISIP** 3. **View Progress reports** 4. **View invoices**		
5. **What persons does the grant pay for?** 6. **View personnel files of those hired by the grant** 7. **View time records and calculations for personnel**		

8. Are personnel practices consistent with the policies? 9. Are personnel records and practices consistent with contract? 10. View Invoices.		
11. Does the ODP funded project have an accounting system and financial records to accurately account for funds awarded? Provide a brief explanation.		
12. Do personnel files exist for all staff employed with grant funds? Do the files include the required information? Note if personnel assigned to the project meet qualifications specified in the grant. If not, what qualifications do personnel have?		

VI. Equipment and Real Property Management		
REVIEW ITEM	**COMMENTS/WORK ODPPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work ODPper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. Preview Equipment List		
2. View Equipment purchase and reimbursement		

3. Preview equipment management policies and procedures and procurement process		
4. What is procurement process?		
5. What is equipment rate?		
6. Does the agency abide by the procurement process?		
7. Is equipment rented?		
8. Is equipment leveraged?		
9. Does the agency have an equipment and adequate documentation to support reimbursement?		

CONSULTANT AND SUBCONTRACTED SERVICES		
REVIEW ITEM	**COMMENTS/WORK ODPPER REFERENCE** *(Comments should identify specific information relating to compliance, indicate work ODPper reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. If subcontracts are used, did the agency obtain prior written approval from ODP?		

2. Preview subcontractor contract		
3. Describe services provided by subcontract.		
4. Does the subcontract include a complete budget for the subcontracted expenses?		
5. Discuss the subcontracted consultants' work in terms of agreement with grant award.		
6. In that the Grantee agency is responsible for all work performed under a subcontract, describe grantee's process for monitoring subcontract. (Include dates of monitoring, comments on the monitoring, date of visit if subcontract is monitored.)		

IX. Procurement, Suspension and Debarment		
REVIEW ITEM	**COMMENTS/WORK ODPPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work ODPper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. Preview By-Laws **2. Preview procurement process and policy** **3. Does the agency abide by the procurement process and By-Laws**		

4. Provide a brief explanation		
5. Did organization utilize the bid process? **6. How many bids did the sub-grantee obtain** **7. Preview copy of public notice** **8. Preview copies of bids** **9. Did subgrantee satisfy bid requirements?**		
10. Has reasonable cost been established and documented? **Note:** 　**a. use of historical docs for similar work** 　**b. Average cost for similar work** 　**c. Published unit costs from national estimating databases** 　**d. FEMA cost codes**		

VII. Matching Level of Effort Earmarking		
REVIEW ITEM	**COMMENTS/WORK ODPPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work ODPper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. What sources are utilized for Donated		

Resources / In-Kind match?		
2. **Are in-kind costs allowable?**		
3. **Does the ODP funded project have an accounting system and financial records to accurately account for Volunteer labor, donated equipment and donated materials?** **Provide a brief explanation**		

ADMINISTRATIVE ISSUES		
REVIEW ITEM	**COMMENTS/WORK ODPPER REFERENCE** *(Comments should identify specific information relating to compliance, indicate work ODPper reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	**C/NC** *C = Compliance* *NC = Noncompliance*

1. **Have any changes been made to the program?** **If so what changes?** **Has the Program Manager been notified?** 2. **Are any changes expected in the program?** **If so what changes?** 3. **Does the agency follow ODP procedures for contract revisions and contract amendments**? **Describe.** 4. **Does the agency maintain records documenting services provided?**		
5. **Have there been changes in the Authorized Official, Project Director, Financial Director, Agency Board Chair, or grant-funded positions during the contract year?** 6. **Has ODP been notified of any changes in Address? Phone number? E-mail address?**		
7. **Did this agency have findings in the previous fiscal year? If so, do they still exist or have they been addressed appropriately?**		

XII. Reporting

REVIEW ITEM	COMMENTS/WORK ODPPER REFERENCE *(Comments should identify specific information relating to compliance, indicate work Page reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	C/NC *C = Compliance* *NC = Noncompliance*
1. Is the agency meeting reporting requirements by submitting reports as specified in the ODP Guide? <mark>**Financial Status Reports**</mark> **(a financial report is due every quarter) pg 59 Manual** **Biannual Strategy due 30 after end of period pg 60** **Final FSR is due 120 days after grant ends**		
2.. Does the agency have a cost allocation plan? Has it been approved by their Cognizant State Agency? (TN Uniform Subrecipient Reporting for Nonprofit Agencies)		
4. Are administrative cost being allocated according to the approved plan?		
4. Is the Policy O3 report being filed?		
5. Did the agency expend more than $500,000 in first year and if so was an audit performed?		

Finance and Programs
MONITORING GUIDE FOR PUBLIC ASSISTANCE

Subrecipient:_____ **Program Monitor:**_____

Grant/Contract Number:_____ **Date of Visit**_____ **Fiscal Monitor:**_____

I. ACTIVITIES ALLOWED OR UNALLOWED		
REVIEW ITEM **Be aware of large transfers of fund from program accounts which may have been used to fund allowable activity**	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. **Is the project being implemented as described on the Project Worksheet?**		
2. **Is the project on target and working toward the stated goal(s)?**		
3. **Provide a brief explanation.**		
4. **Identify project start date.**		

(Project Narrative)		
15. Is the project funded by any other funds? Cannot be Federally funded.		
16. What sources are utilized for Donated Resources / In-Kind match? **Volunteer labor, donated equipment and donated materials** **Note: Page 41 for cost calculations** **FEMA (NEMIS) automatically calculates**		
17. View insurance policy. **18. Is policy still effective?** **11. What type of insurance does the organization have?** **12. Have any claims been made for this disaster?** **13. What benefits have been paid from those claims?** **See page 94-97 insurance**		
==**14. Have there been any changes in scope of the project or project spending?**== ==**15. If yes has the Project Manger been notified?**== ==**16. Are any changes in scope or costs projected?**== **See Pg 115 for compliance**		
17. How many progress reports have been submitted and dates? **18. How many should have been submitted and dates?** **Large projects submit reports**		

II. ALLOWABLE COSTS/COST PRINCIPLES

REVIEW ITEM **OMB Circular A-87 Cost Principles State and Local Govern. and A-122 NP**	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
11. What services does the grant pay for? 12. View Project Worksheets 13. View Progress reports 14. View receipts		
11. What persons does the grant pay for? 12. Is it a force account? 13. Are their temp hires? 14. View personnel files of those hired by the grant 15. View time records and calculations for personnel 16. Are personnel practices consistent with the policies? 17. Are personnel records and practices consistent with contract? 18. View Invoices. See page 35		
11. Does the PA funded project have an accounting system and financial records to accurately account for funds awarded? Provide a brief explanation.		
12. Do personnel files exist for all staff employed with grant funds? Do the files include the required information? Note if personnel assigned to the project meet qualifications specified in the grant. If not, what qualifications do personnel have?		

VI. Equipment and Real Property Management		
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
PA grant replace destroyed equipment and reimburse for applicant owned equipment **1. Preview Equipment List**		
2. View Equipment purchase and reimbursement		
3. Preview equipment management policies and procedures and procurement process		
4. What is procurement process?		
5. What is equipment rate?		
6. Does the agency abide by the procurement process?		
7. Is equipment rented?		

8. Is equipment leveraged? 9. Does the agency have an equipment and adequate documentation to support reimbursement? **Note: Page 41 for cost calculations page 38**		

CONSULTANT AND SUBCONTRACTED SERVICES		
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance, indicate work paper reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. If subcontracts are used, did the agency obtain prior written approval from PA?		
2. Preview subcontractor contract		
3. Describe services provided by subcontract.		
4. Does the subcontract include a complete budget for the subcontracted expenses?		
5. Discuss the subcontracted consultants' work in terms of agreement with grant award.		
6. In that the Grantee agency is responsible for all work performed under a subcontract, describe		

grantee's process for monitoring subcontract. (Include dates of monitoring, comments on the monitoring, date of visit if subcontract is monitored.)		

IX. Procurement, Suspension and Debarment		
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. Preview By-Laws (non-profits only) **2. Preview procurement process and policy** **3. Does the agency abide by the procurement process and By-Laws** **Provide a brief explanation**		
15. Did organization utilize the bid process? **16. How many bids did the sub-grantee obtain** **17. Preview copy of public notice** **18. Preview copies of bids** **19. Did company satisfy bid requirements?**		
20. Has reasonable cost been established and documented? **Note:**		

a. use of <mark>historical docs</mark> for similar work b. **Average cost for similar work** c. **Published unit costs from national estimating databases** d. **FEMA cost codes**		

VII. Matching Level of Effort Earmarking

REVIEW ITEM	COMMENTS/WORK PAPER REFERENCE *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	C/NC *C = Compliance* *NC = Noncompliance*
5. **What sources are utilized for Donated Resources / In-Kind match?** **Note: Page 41 for cost calculations**		
6. **Are in-kind costs allowable?** **Cat A and B only**		
7. **Does the PA funded project have an accounting system and financial records to accurately account for Volunteer labor, donated equipment and donated materials?**		

Provide a brief explanation **Note: Page 41 for cost calculations**		

ADMINISTRATIVE ISSUES		
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance, indicate work paper reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. Have any changes been made to the project? **If so what changes?** **Has the Program Manger been notified?** **2. Are any changes expected in the program?** **If so what changes?** **3. Does the subgrantee follow PA procedures for contract revisions and contract amendments? Describe.** **4. Does the agency maintain records documenting services provided?**		
8. Have there been changes in the Applicant's agent or grant-funded positions during the contract year? **9. Has PA been notified of any changes in Address? Phone number? E-mail address?**		
10. Did this agency have findings in the previous fiscal year? If so, do they still exist or have they been addressed appropriately?		

XII. Reporting

REVIEW ITEM	COMMENTS/WORK PAPER REFERENCE *(Comments should identify specific information relating to compliance, indicate work paper reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	C/NC *C = Compliance* *NC = Noncompliance*
1.. **Is the agency meeting reporting requirements by submitting reports as specified in the PA Guide Check all that apply. Large projects only**		
2.. **Does the agency have a cost allocation plan? Has it been approved by their Cognizant State Agency?** (TN Uniform Subrecipient Reporting for Nonprofit Agencies)		
8. **Are administrative cost being allocated according to the approved plan?**		
4. **Is the Policy O3 report being filed?**		
9. **Is Title VI of the Civil Rights Act of 1964 posted?** Title VI prohibits discrimination on the basis of race, color, or national origin in any program or activity that receives Federal funds or other Federal financial assistance. This applies to any program activity, services or benefits.		

Finance and Programs
MONITORING GUIDE FOR MITIGATION

Subrecipient: _____   **Program Monitor:** _____

Grant/Contract Number: _____   **Date of Visit** _____   **Fiscal Monitor:** _____

I. ACTIVITIES ALLOWED OR UNALLOWED		
REVIEW ITEM **Be aware of large transfers of fund from program accounts which may have been used to fund allowable activity**	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. Is the project being implemented as described on the Scope of Work and contract? 2. Is the project on target and working toward the stated goal(s)? **3. Provide a brief explanation.** **4. Identify project start date.** **Page 28**		
19. Is the project funded by any other funds?		
20. What sources are utilized for Donated Resources / In-Kind match? **Volunteer labor, donated equipment and donated materials** **Page 32**		
21. Is the Administrative Allowance properly documented? **22. Are the Administrative allowance activities in compliance with the Manual?** **Note:** **Preview Administrative fees and duties.** **See page 36 and 1 of 3 for compliance (direct cost,**		

specific managerial duties, ex. Prof salaries are not eligible) Only HMGP		
23. View insurance policy. **24. Is policy still effective?** **11. What type of insurance does the organization have?** **Only Elevation/Retorfit**		
19. Have there been any changes in scope of the project or project spending? Pg 42 **20. If yes has the Project Manger been notified?** **21. Are any changes in scope or costs projected?**		
22. How many progress reports have been submitted and dates? **23. How many should have been submitted and dates?**		

II. ALLOWABLE COSTS/COST PRINCIPLES		
REVIEW ITEM OMB Circular A-87 Cost Principles State and Local Govern. and A-122 NP	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
21. What services does the grant pay for? 22. View SOW 23. View quarterly reports 24. View invoices 25. Were all funds extinguished 90 after program? **Page 24 manual**		
19. What persons does the grant pay for? 20. View personnel files of those hired by the grant 21. View time records and calculations for personnel 22. Are personnel practices consistent with the policies? 23. Are personnel records and practices consistent with contract?		
11. Does the funded project have an accounting system and financial records to accurately account for funds awarded? Provide a brief explanation.		
12. Do personnel files exist for all staff employed with grant funds? Do the files include the required information? Note if personnel assigned to the project meet qualifications specified in the grant. If not, what qualifications do personnel have? **No overtime allowed**		

VI. Equipment and Real Property Management		
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. Preview Equipment List		
2. View Equipment purchase and reimbursement		
3. <mark>Preview equipment management policies and procedures and procurement process</mark>		
4. What is procurement process?		
5. What is equipment rate?		
6. Does the agency abide by the procurement process?		
7. Is equipment rented?		
8. Is equipment leveraged?		
9. Does the agency have an equipment and adequate documentation to support reimbursement?		

CONSULTANT AND SUBCONTRACTED SERVICES		
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance, indicate work paper reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. If subcontracts are used, did the agency obtain prior written approval from Mit? **2. Preview subcontractor contract** **3. Describe services provided by subcontract.** **4. Does the subcontract include a complete budget for the subcontracted expenses?**		
5. Discuss the subcontracted consultants' work in terms of agreement with grant award.		
6. In that the Grantee agency is responsible for all work performed under a subcontract, describe grantee's process for monitoring subcontract. (Include dates of monitoring, comments on the monitoring, date of visit if subcontract is monitored.)		

IX. Procurement, Suspension and Debarment		
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. Preview By-Laws 2. Preview procurement process and policy 3. Does the agency abide by the procurement process and By-Laws **Provide a brief explanation**		
26. Did organization utilize the bid process? 27. How many bids did the sub-grantee obtain 28. Preview copy of public notice 29. Preview copies of bids 30. Did company satisfy bid requirements?		

31. Has reasonable cost been established and documented?
Note:
   a. use of historical docs for similar work
   b. Average cost for similar work
   c. Published unit costs from national estimating databases
   d. FEMA cost codes		

VII. Matching Level of Effort Earmarking		
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance; indicate work paper reference where supporting documentation is found.*	**C/NC** *C = Compliance* *NC = Noncompliance*
10. What sources are utilized for Donated Resources / In-Kind match? **Page 38**		
11. Are in-kind costs allowable?		
12. Does the funded project have an accounting system and financial records to accurately account for Volunteer labor, donated equipment and donated materials? **Provide a brief explanation**		

	ADMINISTRATIVE ISSUES	
REVIEW ITEM	**COMMENTS/WORK PAPER REFERENCE** *(Comments should identify specific information relating to compliance, indicate work paper reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	**C/NC** *C = Compliance* *NC = Noncompliance*
1. Have any changes been made to the SOW? **If so what changes?** **Has the Program Manger been notified?** **2. Are any changes expected in the program?** **If so what changes?** **3. Does the agency follow procedures for contract revisions and contract amendments? Describe.** **4. Does the agency maintain records documenting services provided? page 42**		
11. Have there been changes in the Authorized Official, Project Director, Financial Director, Agency Board Chair, or grant-funded positions during the contract year? **12. Has Mit been notified of any changes in Address? Phone number? E-mail address?**		
13. Did this agency have findings in the previous fiscal year? If so, do they still exist or have they been addressed appropriately?		

XII. Reporting

REVIEW ITEM	COMMENTS/WORK PAPER REFERENCE *(Comments should identify specific information relating to compliance, indicate work paper reference where supporting documentation is found, & indicate if reviewed by fiscal consultant.)*	C/NC C = Compliance NC = Noncompliance
1.. **Is the agency meeting reporting requirements by submitting reports as specified in the Mit Guide page 23?** **Quarterly reports Jan 30, April 30, July 30 and Oct 30 page23** **Final Report 90 days from grant expiration**		
2.. **Does the agency have a cost allocation plan? Has it been approved by their Cognizant State Agency?** (TN Uniform Subrecipient Reporting for Nonprofit Agencies)		
13. **Are administrative cost being allocated according to the approved plan?**		
4. **Is the Policy O3 report being filed?**		