BBH Grants Monitoring & Compliance

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WEST VIRGINIA
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BUREAU FOR BEHAVIORAL HEALTH & HEALTH FACILITIES

What is Grants Monitoring & Compliance?

- Adopting and consistently applying systematic procedures to assure:

  - that grant funded programs are effectively implemented, and

  - that requirements imposed by the funding agency are being met.

- Utilizing resources for their stated purpose per the grant agreement.

- Delivering and reporting performance measures required by the funding entity.

Why is Monitoring Important and Necessary?

Assuring compliance with funding agency requirements is critical as federal and state regulations are becoming more stringent and competition for limited grant funds is increasing.

BBH Monitoring Process

BBH's monitoring process consists of conducting site visits and performing desk reviews that may include:

- Use of Monitoring Tools
- Reporting Compliance
- Review Findings and Recommendations
- Implementation of Corrective Action Plans

Compliance & Monitoring Tools

- *Why use them?* To identify and monitor:
  - performance indicators,
  - program requirements, and
  - state and federal regulations.
- *Who develops them?*
  - grantees,
  - subgrantees, and/or
  - agencies responsible for monitoring and compliance for grant awards.
- *Do they have other uses?* They can be used:
  - to measure the impact a project has had,
  - to collect data reported, and
  - to ensure performance measures and milestones have been achieved.

Compliance & Monitoring Tools

BBH uses compliance and monitoring tools to measure:

- Adherence to federal and state regulations for BBH <u>and</u> subgrantees

- Performance indicators for grant awards for BBH <u>and</u> subgrantees

- Capacity of an agency to meet performance measures

- Performance of an organization regarding stewardship of grant funds and resources

When developing a Compliance & Monitoring Tool, BBH examines multiple sources of information including:

- Notice of Award (NOA) or Funding Opportunity Announcements (FOA) from BBH's source of funds
- Notice of Funding Availability (NOFA) from BBH's source of funds
- Announcement of Funding Availability (AFA)
- Statements of Work (SOW) or other contracts with grantees and subgrantees
- Grant proposals/work plans submitted to BBH's source of funds and submitted to BBH by grantees and subgrantees
- Other relevant sources depending on the funding stream

Terms Used

SAMHSA	BBH
Notice of Award (NOA)-A document that informs BBH of an award and contains performance criteria	**Statement of Work (SOW)**-a document that essentially serves as a contract with a grantee/provider and should contain details regarding expected performance measures, reporting requirements, etc.
Funding Opportunity Announcement (FOA)-A document that advertises the availability of funds and contains requirements regarding eligibility, any relevant federal regulations, expected outcomes, and other project details	**Announcement of Funding Availability (AFA)**-A document that advertises the availability of funds and contains requirements regarding eligibility, expected outcomes, and other project details

Grant Application/Work Plan-A document written in response to a funding announcement that includes requested criteria from the potential funder such as proposed activities, performance measures, and capacity of the potential grantee for fulfilling the expected outcomes outlined by the funder

Reporting data is a required activity for any grant award, including funds received by BBH and subgranted by BBH.

- BBH may be required to ask a subgrantee to report data to BBH due to a requirement to submit data to their state or federal funders.

- Most grantees will find all of their performance measures within their Statement of Work or contract. Contact your Grants Manager if you cannot find them.

- Reporting data in a timely manner is essential to measuring the *quality* of a funded program and the *quantity* of goods or services provided.

Site Visits

A site visit is when a granting entity (e.g., BBH) that's responsible for compliance and monitoring activities visits a grantee/subgrantee's physical location to conduct a review.

A site visit is typically divided into two activities:

1. Staff Interviews—to gather additional information about the project(s) being reviewed.
2. Records Review—to ensure individual service records are compliant with any relevant regulations and that there is a complete record of the services received.

Site Visits

Prior to a site visit, BBH may review the following items for the relevant project(s) under review:

- The Statement of Work (SOW) or contract for the project(s)
- Financial data including budgets and expenditures
- Data reported during the project(s) funding period
- State and federal regulations relevant to the funding allocation

Site Visits

During a site visit, BBH will request access to the following items for the relevant project(s) under review:

- Staff assigned/responsible for the project(s) for interview purposes

- Service records for individuals receiving services/enrolled in the project(s) being reviewed (having received a service during a specified time period)

- The grantee/subgrantee's written policies and guidance relevant to the project(s)

Desk Review

A Desk Review is an administrative audit function of the granting entity that's responsible for compliance and monitoring activities of the grantee/subgrantee.

During a Desk Review, BBH may review the following items for the relevant project(s) under review:

- Performance indicators and other requirements in the Statement of Work or contract
- Financial Data including budgets and expenditures
- The written grantee/subgrantee's policies and guidance relevant to the project(s)

Final Reports

BBH may develop a written report based on the grantee/subgrantees review. The report will contain details outlining the outcome of the review including:

- Any findings resulting from the review
- Any recommendations to the grantee/subgrantee
- Any corrective actions required for the grantee/subgrantee
- Additional comments from BBH Monitoring & Compliance staff in regard to the project(s)

- **Finding:** An item that is a requirement of the grantee/subgrantee that has been identified by the BBH Compliance Team that requires additional action or information in order to be considered met

- **Recommendation:** A <u>suggested</u> action, resource, or additional information that may assist the grantee with meeting a requirement

- **Corrective Action:** An action or additional information from the grantee/subgrantee that is <u>required</u> for the grantee to be considered meeting a requirement

- **Comments:** Additional information provided by the BBH Compliance Team regarding clarification of a regulation, technical assistance, or other resources that may assist a grantee with meeting a requirement

Each item identified as a corrective action in a final report requires the following:

- The grantee/subgrantee must develop and submit a plan of correction complete with action steps and timelines to BBH that is consistent with the information provided by BBH in the final report

- BBH must follow up with the grantee/subgrantee to review progress with implementing and completing the action items identified in the plan of correction

Contacts

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