

**DEPARTMENT FOR AGING AND REHABILITATIVE SERVICES
FISCAL AND PROGRAM MONITORING OF THE SCSEP TITLE V
CONTRACTORS/SUBPROJECTS**

EFFECTIVE DATE: September 2011, Revised December 2013

Scope:

This policy is applicable to the Department for Aging and Rehabilitative Services (DARS) contracts with Area Agencies on Aging (AAAs) and any other organizations (Title V contractors) that deliver Senior Community Service Employment Program (SCSEP) services, under Title V of the Older Americans Act (OAA), in designated jurisdictions within the Commonwealth.

Purpose:

To ensure the SCSEP programs are monitored in full compliance with federal regulations 29 CFR Part 97, Section 97.40(a).

Background:

Section 29 CFR Part 97.40(a) details the DOL monitoring and reporting program performance requirements.

Monitoring by grantees. Grantees are responsible for managing the day-to-day operations of grant and subgrant supported activities. Grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function or activity.

Attached to this policy for reference is the full citation on Monitoring and Reporting Program Performance of 29 CFR Part 97, Section 97.40.

Policy:

DARS conducts three types of reviews of subprojects. It includes reviews of monthly financial and statistical reports, data validation, and onsite fiscal and program monitoring.

DARS staff will review subproject financial reports monthly for reasonable request of funds in compliance with contracted amounts. Additionally, generally quarterly, DARS will review the monthly financial and statistical reports to compile the Older Worker Program ETA 9130 report. Through a separate review, the Project Director will make determinations about subprojects' level of work effort and expenditure of funds to redistribute current funds through a deobligation and reallocation process.

Annually DARS staff will conduct, generally through a nationally recognized contractor, a data validation review.

DARS staff will conduct onsite fiscal and program monitoring of all subprojects once in a three year period. Each contractor/subproject is to be reviewed once in a three year period. The monitoring will include a review for compliance with 20 CFR Part 641.800 Subpart H – Administrative Requirements. Monitoring will include a review of cost types (allocations) and after-the fact determinations of actual time spent working on the SCSEP program. This review will be done in conjunction with DARS review of the overall AAA operations. DARS will issue a compliance review report no more than 60 days after the onsite visit has concluded.

Code of Federal Regulations 29 Part 97

Sec. 97.40 Monitoring and reporting program performance.

(a) Monitoring by grantees. Grantees are responsible for managing the day-to-day operations of grant and subgrant supported activities. Grantees must monitor grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being achieved. Grantee monitoring must cover each program, function or activity.

(b) Nonconstruction performance reports. The Federal agency may, if it decides that performance information available from subsequent applications contains sufficient information to meet its programmatic needs, require the grantee to submit a performance report only upon expiration or termination of grant support. Unless waived by the Federal agency this report will be due on the same date as the final Financial Status Report.

(1) Grantees shall submit annual performance reports unless the awarding agency requires quarterly or semi-annual reports. However, performance reports will not be required more frequently than quarterly. Annual reports shall be due 90 days after the grant year, quarterly or semi-annual reports shall be due 30 days after the reporting period. The final performance report will be due 90 days after the expiration or termination of grant support. If a justified request is submitted by a grantee, the Federal agency may extend the due date for any performance report. Additionally, requirements for unnecessary performance reports may be waived by the Federal agency.

(2) Performance reports will contain, for each grant, brief information on the following:

(i) A comparison of actual accomplishments to the objectives established for the period. Where the output of the project can be quantified, a computation of the cost per unit of output may be required if that information will be useful.

(ii) The reasons for slippage if established objectives were not met.

(iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

(3) Grantees will not be required to submit more than the original and two copies of performance reports.

(4) Grantees will adhere to the standards in this section in prescribing performance reporting requirements for subgrantees.

(c) Construction performance reports. For the most part, on-site technical inspections and certified percentage-of-completion data are relied on heavily by Federal agencies to monitor progress under construction grants and subgrants. The Federal agency will require additional formal performance reports only when considered necessary, and never more frequently than quarterly.

(d) Significant developments. Events may occur between the scheduled performance reporting dates which have significant impact upon the grant or subgrant supported activity. In such cases, the grantee must inform the Federal agency as soon as the following types of conditions become known:

(1) Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation.

(2) Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more beneficial results than originally planned.

(e) Federal agencies may make site visits as warranted by program needs.

(f) Waivers, extensions. (1) Federal agencies may waive any performance report required by this part if not needed.

(2) The grantee may waive any performance report from a subgrantee when not needed. The grantee may extend the due date for any performance report from a subgrantee if the grantee will still be able to meet its performance reporting obligations to the Federal agency.