

**Carl Perkins Subrecipient Monitoring Policy**

**Purpose**

The purpose of this subrecipient monitoring policy is to comply with the Office of Management and Budget (OMB) Uniform Guidance regarding the monitoring and stewardship obligations as the primary award recipient.

**Policy Statement**

It is the policy of the Oklahoma Department of CareerTech (CareerTech) to monitor the activities of subrecipients to ensure that the activities of the subaward project objectives are necessary and that performance goals are achieved and that all funds are used for authorized purposes in compliance with Federal statutes, regulations, and the terms and conditions of the grant agreement. (See §200.332 (d))

**Types of Monitoring**

CareerTech will use a risk based approach to determine the subrecipients to be monitored each fiscal year. A comprehensive risk assessment will be conducted involving all potential subrecipients before each year’s award decision. Depending on the level of risk posed by the subrecipient, the following monitoring tools will be used by CareerTech to ensure proper accountability and compliance:

* Desk Reviews - Review of the programmatic and financial activity of the subrecipient. These reviews are the least invasive and will consist of lower risk subrecipients.
* Desk Reviews with training and technical assistance - These reviews result from desk audits for which it is determined need additional training and technical assistance in programmatic and/or financial matters.
* Onsite / Virtual Reviews – Review of the programmatic and financial activity of the subrecipient either through an onsite visit or a virtual meeting. These reviews are more comprehensive and consists of the higher risk subrecipients.

**Monitoring Schedule**

Each year, 20% of all subrecipients will be monitored with all being monitored over a five year period. Based on the results of the risk assessment, a determination will be made as to the type of monitoring that is appropriate for each subrecipient: a desk review; a desk review with training and technical assistance; or an onsite / virtual visit.

**Monitoring Process Team**

The onsite / virtual review team from CareerTech will include the Internal Auditor and Perkins Coordinator, at minimum. Depending on the size and scope of monitoring, other staff may be added including: Federal Programs Manager, Perkins Financial Analyst, CTE Program Specialist, Regional Coordinator and Career and Academic Connections Specialist.