## Management of Sub-Grants Procedure Manual

Oklahoma Department of Corrections

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#### PRIMARY RECIPIENT AGENCY RESPONSIBILITIES

When the Oklahoma Department of Corrections (ODOC) is the primary recipient of funding, the following guidelines will be applied to subrecipients.

#### **Grants Application and Administration**

Grant application and administration follows the guidelines of OP-120104 which govern the management and oversight of grants which includes:

- Preparing the applications for the federal grant funds;
- Developing and distributing the application notice and application forms;
- Review and evaluation of the submitted subgrantee applications for funding;
- Receiving funds from the federal granting agency and disbursing the funds to the subgrantees throughout the grant cycles;
- Maintaining accurate ledgers and other fiscal records for subgrantees;
- Evaluating and monitoring compliance of subgrantees in meeting state and federal requirements;
- Providing guidance and technical assistance to subgrantees;
- Collecting statistical data from the subgrantees to assess program effectiveness in order to provide information to the federal granting agency; and,
- Preparing and submitting the required progress, financial, and evaluation reports to the federal granting agency by the assigned deadlines.

#### **GOALS OF MONITORING**

Monitoring is one of the principal responsibilities of the Grants Department. It is the responsibility of the Grants Manager and Grants Accountant to assist the subgrantees in implementing the approved projects within a framework of relevant state and federal statutes, regulations, policies, procedures, and guidelines so as to achieve maximum success. In order to be effective, it is imperative that the monitoring process occurs throughout the course of the award period.

Through proactive monitoring of subgrantees, the Grants Department is able to ensure that fiscal accountability and programmatic integrity are maintained. In addition, monitoring enables ODOC to:

- Ensure that projects initiated by subgrantees are carried out in a manner consistent with the subgrantee's stated goals and objectives
- Identify and resolve problems that may impede effective implementation of project
- Collect data to provide comprehensive fiscal information and specified progress reports to the federal granting agency
- Provide any needed consultation and technical assistance to the subgrantee

It is essential to assess on an ongoing basis to ensure that the project is progressing toward the stated goals, objectives, and activities. If a project is not on a path to meet the stated objectives, the Grants Department can assist in making adjustments and improvements as needed. By conducting project monitoring, ODOC demonstrates good stewardship of the federal funds and is able to accomplish a portion of the responsibilities as required of state-administering agencies.

#### SCOPE AND TYPES OF MONITORING

There are two different types of monitoring that can be used: on-site monitoring and desk reviews.

Oklahoma Department of Corrections utilizes a hybrid monitoring system for most grants. One year will consist of a full on-site monitoring visit while the next year consists of a desk review.

On-site monitoring allows the ODOC staff:

- Face-to-face interaction with the project staff to discuss specific issues related to the project, such as progress on goals and objectives, financial, and personnel issues.
- To observe grant activity, review files, and make judgments about planned versus actual progress.
- An opportunity to develop or continue a collaborative relationship between the state-administering agency and the subgrantee.

To conduct an on-site visit, the Grants Department arranges a site visit date with the subgrantee. The Project Director, the Fiscal Officer, and grant-paid staff members are required to attend the site visit. A confirmation letter with a Pre-Monitoring Checklist is sent to the subgrantee.

In addition to on-site monitoring visits, the Grants Department may conduct periodic desk reviews.

A desk review is conducted in order to:

- Ensure the award to the subgrantee was appropriately executed;
- Determine if the subgrantee is in compliance with the fiscal and programmatic reporting requirements;
- Determine if the special conditions were met and properly cleared; and,
- Assess the progress of the program and identify any problems encountered (e.g., fiscal or administrative).

To conduct a desk review, the Grants Department requests various supporting documents from the subgrantee, such as invoices and receipts. Upon receiving the information, the Grants Department will review the information to ensure that the subgrantee has implemented the grant program according to relevant state and federal statutes, regulations, policies, procedures, and guidelines.

If concerns were found after conducting a desk review, the Grants Department would compile and share a list of issues to discuss before scheduling a time to contact the subgrantee to clarify any concerns.

#### MONITORING CRITERIA FOR THE FEDERAL GRANTS

In order to prioritize monitoring, the Grants Department has set criteria to direct the onsite and desk reviews of the grant programs. Priority for monitoring is given to subgrantees where problems have been identified, implementation has been problematic, or where the subgrantee has specifically requested technical assistance. The Grants Department follows these criteria in planning and implementing on- site visits.

#### **Monitoring Criteria**

- A. Potential subgrantees receive an initial Risk Assessment before they are awarded.
- B. Based on the initial Risk Assessment, no less than 50% of the subgrantees of an award will receive an on-site monitoring visit attended by the subgrantee's project director and fiscal officer.
- C. The Grants Department will select the subgrantees with which to conduct a site visit and the time line in which the site visit will be conducted.
- D. The subgrantees provide the following for the purchase of approved equipment: an initial quote, any purchase orders used, invoices, and copies of payment for the Grants Department's review and closeout

#### **RISK ASSESSMENT OF SUBGRANTEES**

#### **Purpose**

The purpose of conducting risk assessments on subgrantees is to create a proactive system insuring administrative, programmatic, and fiscal success of all subgrantees during the monitoring process. It is an acknowledgement that some subgrantees may need additional assistance to implement an effective project. The assignment of risk can change throughout the grant period, depending on changing circumstances. The risk assessment should not be viewed as a pejorative or punitive system, but as a tool to create a high functioning program.

#### **Rating System**

At the beginning of each grant cycle, the Grants Department will conduct a risk assessment of each subgrantee based on certain criteria.

The system is the assignment of a numeric value to each funded project based on certain criteria, listed below.

- 1 = Highest Risk
- 2 = Moderate Risk
- 3 = Lowest Risk

#### Criteria

A program receives a risk value based on circumstances of the grant, past performance, individual situations, information gathered during the application or monitoring process, and other criteria deemed relevant by the Grants Department. A value is assigned based on the number of criteria that apply.

Highest Risk is 6 or more criteria Moderate Risk is 3-5 criteria Lowest Risk is 2 or less criteria

A subgrantee that has no history in successfully implementing a grant is automatically rated as a high risk.

The remaining criteria are as follows:

#### Administrative Criteria:

- 1. New Subgrantee.
- 2. There is a change in the Chief Executive Officer in the most recent grant year.
- 3. There is a change in the Project Director in the most recent grant year.
- 4. There is a change in the Fiscal Officer in the most recent grant year.
- 5. The subgrantee has been placed on Draw Hold for a fiscal or programmatic issue in the most recent grant year.

- 6. The subgrantee has had significant corrective action(s) in the most recent grant year.
- 7. The subgrantee didn't receive an on-site monitoring visit in the previous year.
- 8. The subgrantee submits inaccurate or incomplete Award Documents.
- 9. There appears to be a division of duties/lack of internal controls within the agency.

#### **Financial Criteria:**

- 1. The subgrantee submitted two or more late or incorrect MFRs and or QFRs in the most current grant year.
- 2. The subgrantee submitted an incorrect revised budget.

#### **Programmatic Criteria:**

- 1. The subgrantee submitted late or incorrect Programmatic Reports in the most recent grant year.
- 2. The subgrantee submitted incorrect or incomplete revised goals and objectives.
- 3. The awarded project experienced a delayed start.
- 4. The subgrantee not making sufficient progress toward approved goals and objectives in the most recent grant year.
- 5. The subgrantee made a significant change in program goals in the most recent grant year.

#### Action

Based on the assigned value, the following course of action may be taken:

- If the subgrantee is new, a site visit will automatically be conducted.
- For a high risk subgrantee, the Grants Department will conduct a minimum of one site visit and additional desk monitoring, if necessary.
- For a moderate risk subgrantee, the Grants Department will conduct a minimum of one site visit during the life of the grant.
- For a low risk subgrantee, the subgrantee may not be monitored at all for that grant period. However, the Grants Department will conduct a site visit if there was no site visit in previous year. For all others in this category, the Grant Department may conduct a site visit or a desk review if they deem it necessary.

#### OKLAHOMA DEPARTMENT OF CORRECTIONS

## Risk Assessment

Sub	grantee Name:			Grant Number:						
	Administratio	n		Fiscal		Programmatic				
New Subgrantee Change in Authorized Official from Most Recent Grant Year Change in Project Director from Most Recent Grant Year Change in Financial Officer from Most Recent Grant Year A Draw Hold from the Most Recent Grant Year Significant Corrective Actions from Most Recent Grant Year No Site Visit in Previous Grant Cycle Inaccurate/Incomplete Award Docs.				Two (2) or More Late/Incorrect MFRs and/or QFRs from Most Recent Grant Year Incorrect Revised Budget Indirect Cost Awarded		Late/Incorrect Programmatic Reports from Most Recent Grant Year Incorrect or Incomplete Revised Goals/ Objectives Late Program Start from Most Recent Grant Year Not Making Sufficient Progress Toward Approved Goals/Objectives in Most Recent Grant Year Significant Change in Program Goals from Most Recent Grant Year				
Division of Duties/Lack of Internal Controls										
3-5 = Moderate Risk Results in a minim				ne site visit and additional desk monitoring, if nece one site visit by the Grants Department. If "No site visit in grant o	essary, b	y the Grants Department.				

#### RESPONSIBILITIES OF THE GRANTS DEPARTMENT

#### 1. Programmatic, Administrative, and Financial Review of the Grant

In order to conduct an effective monitoring visit, the Grants Department must:

- Possess a thorough understanding of the purpose, goals, objectives, time lines, special conditions of the award, and the budget of the project being monitored;
- Conduct periodic review of the files and telephone contacts with subgrantees;
- Adequately prepare prior to a site visit;
- Understand the structure of the organization being monitored so that the individuals most vital to the grant's activities, both financial and programmatic, can be interviewed; and,
- Be familiar with the Monitoring Report forms

#### 2. Scheduling the Visit

The Grants Department will call the Project Director to arrange a mutually convenient time for a site visit. All of the key personnel involved in the grant should participate in the site visit. At a minimum, the Grants Manager should meet with the Project Director, the Fiscal Officer, and staff paid on the project.

The Grants Department will send a letter or e-mail to the Project Director to confirm the date of the visit. The Grants Department will place a copy or upload a copy of the confirmation in the subgrantee's file.

#### 3. Preparing for the Site Visit

It is critical that the Grants Department prepares in advance for the site visit. This includes compiling the materials to bring to the site visit and reviewing the subgrantee's file. The Grant Department should:

- Identify any missing progress or financial reports;
- Check for any unmet special conditions of the award;
- Review the overall goals, objectives, and activities of the award;
- Develop a checklist of information, documents, or activities to be addressed; and,
- Enter the information into the Monitoring Report form

It is important to review the subgrantee's application, including project goals and objectives against which the progress of the project will be measured. If issues or problems are noted, questions should be noted to ask the project staff so to increase the understanding of the circumstances and shed light on possible solutions.

#### 4. Conducting the Site Visit

The Grants Department is responsible for setting the tone of the site visit and establishing the expectations. The Grants Department will introduce themselves and explain the purpose of the visit emphasizing that this is not an audit. The Grants Department will utilize the Monitoring Report form developed for each grant program in conducting the site visit. The Monitoring Report form is to be used as a guide to direct the site visit.

Any administrative and financial issues that were previously identified should be addressed. Finally, the Grants Department will solicit any needs for technical assistance from the subgrantee.

The Grants Department will review the subgrantee's files to ensure that all grant - related documents are kept on file and that the information is current. The subgrantee's files should contain the following:

- The approved grant application;
- A signed copy of the award documents and special conditions;
- Progress Reports (PMT or MUSKIE);
- Monthly Financial Reports (MFR);
- Quarterly Financial Reports (QFR);
- Grant Adjustment Notices (GAN), and,
- Any correspondence relating to the grant.

#### 5. Site Visit Follow-Up

Within three (3) weeks of the Grants Department's return to the office from the site visit, a post-monitoring report and follow up letter will be sent to the subgrantee.

The report must identify the issues reviewed for compliance, any findings, any recommendations for corrective action, and a deadline for completing the corrective action. The letter should include a note of thanks for the assistance during the visit; especially to the staff that helped make the visit possible. The letter will be addressed to the Project Director from the Grants Department, with a copy sent to the Agency Head as well as to the Authorized Official of the grant, if necessary.

The Grants Department will immediately report any major concerns, such as fraud, waste, and abuse, as well as intentional and unintentional violations and serious irregularities as set forth in the specific grant program's Administrative and Financial Guide, to the ODOC Administrator of Budget and Administrator of Medical and Programs Accounting.

#### SUBGRANTEE FILES

It is critical to maintain complete and well-organized subgrantee files. The following directions have been developed in order to ensure consistency throughout all grant programs for subgrantee files.

All grants should utilize legal sized, six- divider for physical files or digital folders titled as follows:

#### **#1 Front Left:**

Original Application
Budget Revisions and Budget Extension Requests

#### #2 Front Right:

Purchase Order Contract

Grant Adjustment Notices
Change in Project Director/Fiscal Officer Form
Backfill Verification Form
Award Notice Special
Conditions
Special Conditions for Expenditure of Confidential Funds
Authorization to Sign form
Certificate of Equal Employment Opportunity Plan
Statement of Audit Arrangements
Disclosure of Lobbying Activities
Certification of Project Income

#### #3 Middle Left:

Monthly request for funds

#### **#4 Middle Right:**

Voucher Jacket/Claim Form

#### #5 Back Left:

Quarterly report (Reporting of Subgrant Expenditures and Financial Status Form) Quarterly Status Report for Project Income

#### #6 Back Right:

All other correspondence to and from subgrantees Inventory list Statement of Subgrant Equipment Purchases ODOC Progress Reports Draw Holds Risk Assessment

#### **MONITORING TOOLS**

A generic monitoring tool is attached, but the document can be updated to meet specific future grant requirements if needed.

# APPENDIX A MONITORING TOOL

#### Oklahoma Department of Corrections 3400 N. Martin Luther King Ave Oklahoma City, OK 73111

### **Subgrantee Monitoring Form**

Date:			
Project Grant Num	ber:		
Project Name:			
Agency Name:			
Address:			
City:	Zip:	Area Code/Phone Number:	
Individuals Presen	t for Site Visit		
Names:			
Grant Program Sum	nmary:		

This document will facilitate on-site monitoring visits with subgrantees. Site visits are not audits. The purpose of monitoring is to ensure compliance with administrative and fiscal responsibilities as well as to provide consultation and technical assistance to the subgrantee. This document is a working tool. Individual judgment should be exercised to determine the extent to delve into each area.

#### **Grants Manager:**

- Explain the purpose of monitoring.
- Inform the subgrantee that this is also an opportunity for consultation and technical assistance. If there are questions, encourage them to ask.

A.	GENERAL DATA	
1.	Name of Project Director:	
2.	Grant Period: From:_To:	
3.	Extension Requested: YesNoNew Award End Date:_	
4.	Current year funding amount: Federal \$	Match \$
5.	Approved Budget Categories for the Award:	
	Personnel and Benefits Equipment 1	Fravel Other
	Supplies Contractual F	Facilities Indirect Costs
_		
В.	PROJECT ADMINISTRATION	
В.	PROJECT ADMINISTRATION  Records Maintenance	
	Records Maintenance  Does the subgrantee keep records that contains the followin  Grant Application Signed Award Special Conditions Other Award Documents Budget Modifications Correspondence Drug Free Workplace Policy Posted	S NO NO S

Fed	deral Civil Rights Compliance Checklist
1.	If the subrecipient is required to prepare an Equal Employment Opportunity Plan (EEOP) in accordance with 28 C.F.R. pt. 42, subpart E, does the subrecipient have an EEOP on file for review?  YesNoN/A
	If yes, on what date did the subrecipient complete the EEOP?
2.	If the subrecipient is required to submit an EEOP Utilization Report to the Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ)in accordance with 28 C.F.R. pt. 42, subpart E, has the subrecipient done so?  YesNoN/A
	If yes, on what date did the subrecipient complete the EEOPUtilization Report? no, explain
	If yes, what is the date of the subgrantee's most recent EEOP Utilization Report Approval Letter?
3.	Has the subrecipient submitted a Certification Form to the OCR certifying compliance with the EEOP requirements:  YesNo
	If yes, on what date did the subrecipient submit the Certification Form?  If no, explain
4.	How does the subrecipient notify program participants and beneficiaries (e.g., through brochures, postings, or policy statements) that it does not discriminate in the delivery of services or benefits based on race, color, national origin, religion, sex, disability, an age?  Comments

5.	How does the subrecipient notify employees and prospective employees (e.g., through advertisements, recruitment materials, postings, dissemination of orders or policies) that it does not discriminate on the basis of race, color, national origin, religion, sex, and disability?
	Comments
6.	Does the subrecipient have written policies or procedures for notifying employees on how to file complaints alleging discrimination by the subrecipient?
	YesNo
	If yes, explain these policies or procedures.
	If no, explain
	<del> </del>
7.	Does the subrecipient have written policies or procedures for notifying program participants and beneficiaries on how to file complaints alleging discrimination by the subrecipient, including how to file complaints with ODOC and the Office of Civil Rights (OCR)?
	YesNo
	If yes, explain these policies or procedures.
	If no, explain

8.		subrecipient has fifty or more employees and receives DOJ funding of \$25,000 or has the subrecipient taken the following actions:
	a)	Adopted grievance procedures that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Section 504 of the Rehabilitation Act of 1973, found at 28 C.F.R. pt. 42, subpt. G, which prohibit discrimination on the basis of disability in employment practices and the delivery of services?
		YesNoN/A
	b)	Designated a person to coordinate compliance with the prohibitions against disability discrimination in 28 C.F.R. pt. 42, subpt. G?
		YesNoN/A
	c)	Notified program participants, beneficiaries, employees, applicants, and others that the subrecipient does not discriminate on the basis of disability?
		YesNoN/A
	Comm	ents
9.		subrecipient operates an educational program or activity, has the subrecipient the following actions:
	a)	Adopted grievance procedures that provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Title IX of the Education Amendments of 1972, found at 28C.F.R. pt. 54, which prohibit discrimination on the basis of sex?
		YesNoN/A
	b)	Designated a person to coordinate compliance with the prohibitions againstsex discrimination contained in 28 C.F.R. pt. 54?
		YesNoN/A

(	c)					ants fo hers th					•	•			•				
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	l ad	ctiv	ities	to p	ersor	orecipi ns who	o hav	e lim	nited	Engli	ish p	orofic	ien	cy (L	EP)		its	prog	grams
12. Doe LEP					oient l	have a	a writ	tten l	langı	ıage-	acc	ess p	olicy	/ on	pro	vid	ing	serv	ices to
												Yes_		Ν	lo				
If no	0 (	⊃vr	lain									_							
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. If the	subrecipient engages in explicitly religious	activities,	does it do	the following?
a)	Separate the explicitly religious activities federally funded activities:	s in either t	ime or loo	cation from the
		Yes	No	N/A
b)	Ensure that participation in the explicitly participants in the federally funded prog	_	activities is	s voluntary for
		Yes	No	N/A
Comm	ients			
. If the	subrecipient is a religious institution or a f	aith-based	organizat	tion, does the
	cipient do the following:		J	ŕ
,		· · ·		
a)	Provide appropriate notice to program beneficiaries that the subrecipient does			
	religion in the delivery of services or ben		illiate oii	tile basis of
	·			
		Yes	No	N/A
h۱	Dravida appropriate patica to program h	anafiaiaria	c or proce	a a a tinya
IJ)	Provide appropriate notice to program beneficiaries that if they object to the "			
	the subrecipient will make a reasonable			
	provider in close geographic proximity the	nat offers c	omparabl	e services?
		Yes	No	N/A
		1 - 1		
		163		
		.63	140	
c)	Keep a record of the requests for an alte			
c)	Keep a record of the requests for an alter	rnative pro	ovider froi	m beneficiaries o
c)		rnative pro	ovider froi pient's "r	n beneficiaries o eligious characte
c)	prospective beneficiaries who object to	rnative pro the subreci an appropr	ovider from pient's "r iate alterr	n beneficiaries o eligious characte
c)	prospective beneficiaries who object to noting the subrecipient's efforts to find a	rnative pro the subrect an appropr pective be	ovider from pient's "r iate altern neficiary?	m beneficiaries o eligious characte native provider a
	prospective beneficiaries who object to noting the subrecipient's efforts to find a	ernative pro the subrect an appropr pective be Yes	ovider from ipient's "r iate altern neficiary? No	n beneficiaries o eligious characte

16. If the subrecipient receives funding from OVW, does it serve male victims of sexual assault, domestic violence, dating violence, and stalking?

	Comments
17.	If the subrecipient receives funding from OVW, does the subrecipient provide sex-segregated or sex-specific services?  YesNo
	If yes, describe how the services are sex-segregated or sex-specific
	If yes, has the subrecipient determined that providing services that are sex-segregated or sex-specific is necessary to the essential operation of the program?  YesNo
	If yes, describe how the subrecipient determined that providing sex-segregated or sex-specific services is necessary to the essential operation of the program.
	If no, explain
18.	Has your agency received any complaints of discrimination from employees or beneficiaries of the services provided?  If yes, how was the complaint handled?
19.	If you received such a complaint, what would your process or procedures be?

<sup>\*</sup>Notify the subrecipient that if they do receive such a complaint, they must notify ODOC.

2. PersonnelNot Applicable	
A. How many personnel are assigned to this project?	
B. Names of persons/percentage of time paid with gran	nt:
C. Are all authorized staff positions filled?  If no, explain	YesNo
D. Have any positions been back filled?  If yes, name of back fill and date?	YesNo
E. Were the time and attendance records for person project reviewed?	nnel assigned to the  YesNo
If no, explain	
F. Were the time and attendance records in accordanc	ce with the financial guide?  YesNo
If no, explain	
G. Was an I-9 (Immigration and Naturalization Service leach employee?  If no, explain	YesNo
H. If an employee is less than 100% time, is the subgra	ntee reconciling time?

3.	Equipment PurchasesNot Applicable			
A.	Has all equipment been purchased?	Yes	No	
	If no, explain delays			
В.	Are equipment purchases consistent with grant award?	Yes	No	
	If no, explain			
C.	Have all receipts been retained for the equipment purcha		No	
	If no, explain			
	Do these receipts match what is shown on the ledger?			
	If no, explain			
Ε.	Are property records maintained by the subgrantee adeq	uate?		
		Yes	No	
	If no, explain			
F.	Will the equipment purchased continue to be used for the completion of this funding period?		urpose after theNo	
	If no, explain			
G.	Was the equipment actually viewed by the monitor?	Yes	No	
	If no, explain			
4.	TravelNot Applicable			
		-1-1/		
A.	Are expenditures for travel adequately documented with	ciaims/re	eceipts?	
В.	Do these receipts match what is shown on the ledger?	Yes	No	
	If no, explain			

	(i.e., mileage, per diem rates)	Yes	No		
	If no, explain				
5.	Supplies and Operating ExpensesNot Applicable				
A.	Does subgrantee retain receipts?	Yes	No		
	If no, explain				
В.		Yes	No		
C.	Are all items purchased consistent with the approved but		No		
	If no, explain		<del></del>		
6.	Professional and Contractual ServiceNot Applicable	2			
A.	Is a formal contract on file outlining specifically the work to be performed by the consultant?				
	If no, explain		No		
В.	Does the statement of work to be performed agree with	the grant	award?		
C.	Were consultants utilized and paid a fee while employe	-	of government?		
	If no, explain	·	<del></del>		
	, r -				

).	Was the \$650 per day consultant fee limitation observed	d?			
		Yes	No		
	If no, explain				
	Were the contracts competitively bid?	Yes	No		
	If no, explain				
	If contracts were not the result of competitive bids, is the	ere a sole	source justification?		
		Yes	No		
	If no, explain				
7.	Facilities and RentalsNot Applicable				
١.	Does the subgrantee own the building or have a substantial financial interest in the property?				
		Yes	No		
	If yes, is there a written policy or agreement that details	the basis	for cost allocation?		
		Yes	No		
	If no, does subgrantee have a signed contract?	Yes	No		
3.	Is the rent proportional to the personnel funded through the grant program?				
		Yes	No		
	If no, explain				
2.	Are receipts properly maintained?		No		
	If no, explain				
<b>D</b> .	Do these receipts match what is shown on the ledger?	Yes	No		

	Yes	No	
If no, explain			
OtherNot Applicable			
Does subgrantee retain receipts?	Yes	No	
If no, explain			
Do these receipts match what is shown on the ledger	? Yes	No	
If no, explain			
Are all items purchased consistent with the approved			
	Yes	No	
If no, explain			
Indirect CostsNot Applicable			
Has the indirect cost rate changed since awarded?	Yes	No	
If yes, explain			
What base was used to calculate indirect costs?  Explain			
What expenses are being paid for with indirect costs?	?		
Evalain			
Explain			
Are direct costs being paid for with indirect costs?	Yes	No	

#### C. SPECIAL CONDITIONS

••	Has the subgrantee used any federal funds, either directly or indirectly, in support of the enactment, repeal, modification or adoption, of any law, regulation, or policy at any level of government?  YesNo
	If yes, explain
	Does the subgrantee assure that the policies and practices of the service area comply with Oklahoma State Law?  YesNo
	If no, explain
).	PROJECT IMPLEMENTATION/IMPACT
	How are the project goals and objectives being achieved? – See the Goals and Objectives printed from the agency's application.  What is the major accomplishment of this project? What are you most proud of? What has been the significant impact?
•	Have you experienced any barriers in implementing this project?
•	Are there local coordination efforts among law enforcement, courts, prosecution, or service providers?
•	Are there any difficulties with coordination with Law Enforcement, Courts, Prosecution, or Service Providers?

	How often is evidenced based prosecution used?		
	What specific training would you like?		
Ε.	ADMINISTRATING AGENCY		
1.	Have there been any problems or delays in receiving the	grant draw	v down from ODOC?
		Yes	No
	If yes, explain		
2.	Do you have any training or technical assistance needs?		
	If yes, explain		No
3.	Is there anything ODOC can do to assist you?		
F.	PROJECT REPORTING/EVALUATOR		
L.	Who is responsible for completing the progress reports?_		
2.	Are progress reports submitted on time?	Yes	No
	If no, explain		
3.	Are progress reports completed properly?  If no, explain		No

G. FINANCIAL INFORMATION

Н	as the organization ever filed bankruptcy?		No
If	yes, explain:		
G.	Has the organization ever been involved in a civil	_	g federal grant funds? No
_			
lf '	yes, explain:		
Há	as the organization ever fired an employee who allo		zled funds? No
IT <b>y</b>	ves, explain:		
IE -	voc ovalnim		No
Ar	re there any concerns about the expenditure of the		
V	/hat is the source of the match (forfeiture funds, pr		•
If	no, explain		
D	oes the subgrantee maintain a separate ledger for		No
_			
lf	no, explain		
D	oes the subgrantee maintain a general ledger?	Yes	No
_		·	ures of the grant funds

	Is the organization delinquent on any federal debts?	Yes	No	
	If yes, explain:			
١.	Has the organization ever been on the IRS' Auto-revoca	ation list?		
		Yes	No	
	If yes, explain:			
2.	Project Income			
۹.	Does your project generate income?	Yes	No	
В.	Does all reported income meet the definition?	Yes	No	
	If no, explain			
C.	Does the subgrantee maintain a ledger showing all proj			
		Yes	No	
	If no, explain			
D.	Is subgrantee accurately reporting all project income?	Yes	No	
	If no,			
3.	AuditA-133 Audit Not Required			
۹.	Does your agency expend more than \$750,000 from al	I sources of	federal funds in one	year?
	*If yes, an audit is required.	Yes	No	
В.	What was the date of the last audit?			
C.	Who performed the last audit?			
D.	Was a copy of the audit sent to ODOC?	Yes	No	
	If no, when will it be sent?			

E.	Were there findings relative to the federal funds?	Yes	No				
	If yes, what were the findings?						
F.	If so, have the findings been resolved?	Yes	No				
	If no, explain						
G.	When is the next audit scheduled?						
4.	Financial Review						
A.	Are the expenditures in accordance with the grant award						
В.	Have any Request for Funds been late or incorrect? Yes_						
	If yes, explain						
C.	Have any Quarterly Reports been late or incorrect? Yes_		No				
	If yes, explain						
D.	Date of the quarterly report that was reviewed?						
Ε.	Did the quarterly report tie to the ledger?	Yes	No				
	If no, explain						
н.	BOARD INFORMATION FOR NON-PROFIT AGENCIES						
1	How many members are on the heard?						
	How many members are on the board?						
۷.	Was the board roster reviewed?		No				
	If no, explain						

3. How often does the boa	ard meet?			
4. Were the minutes of the	e last three meetings reviewed?	Yes	No	
If no, explain				
5. Are the board meetings			No	
If no, explain				
6. Does the board follow Ro	obert's Rules of Order?	Yes	No	
If no. explain				
7. Are there any issues bet	ween the board and the staff of t	he organiz	ation?	
,		J	No	
If ves explain:				
8. Does the board have an			No	
		·	<del></del>	
if yes, explain:				
I. CLOSE OUT REQUIREM	IENTS			
1. Is subgrantee complyin	g with close out requirements of	past grant	s?	
		Yes	No	
If no. explain				
_				
POST-SITE MONITORING R	EPORT			
Summary/Recommendatio	ns			

I certify that the above listed categories were monitored and all findings and /or recommendations were listed. It appears the subgrantee, except where noted, is in compliance with all applicable federal and state laws, regulations, and guidelines.

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Grants Manager	Date
	n and agree with the report findings and or/corrective actions ased on the findings of this review, except where noted, appears al and state requirements.
Administrator of Budget	 Date
Re-monitoring Unnecessary	No Corrective Actions
Suggest Re-monitoring	Corrective Actions Required