**WorkforceGPS**

**Transcript of Webinar**

**Conducting Remote Monitoring Reviews**

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JONATHAN VEHLOW: Welcome to "Remote Monitoring ETA Grantee" webinar. So without further ado I'd like to kick things off to our moderator today, Leo Miller, regional administrator with the U.S. Department of Labor regions one and two. Leo, take it away.

LEO MILLER: Hey, Jon. Thanks for the introduction. Before we get started, I was wondering if you could show us our polling questions – the results of our polling questions. I saw we had a couple polling questions up and folks let us know what they thought their expertise and experience was within the area of risk assessment and also monitoring.

One of the things that I find encouraging as a federal employee is that 66 percent of folks – 65 percent, 62; it's up and down – but the vast majority of folks seem to have a well-defined list of risk indicators that forms the assessment of your monitoring strategy. Because I'll say one of the ways that the remote monitoring tool works best is if it's coupled with a robust risk assessment strategy.

So those of you that don't have one, don't fret. This is an opportunity for us to have those discussions as well. You have folks at your regional office at the Employment and Training Administration that are pretty savvy at risk assessments and looking at elements of grantee performance and subgrantee performance and making those assessments.

With your experience of remote monitoring, the vast majority looks like it's just starting or just really figuring out what this tool can do for you. And it looks like 16 percent say that they are a pro at it; you've been doing it for years.

So this webinar was designed to meet the needs of all customers. We have some really great federal employees that are going to be presenting and we also have some really great grantee employees that have experience doing this that's going to make it real for you.

So Jon, thank you for showing us those. I'd like the presenters to keep those statistics in mind as we go on.

So I'm Leo Miller. I'm the regional administrator of the Boston and Philadelphia regional offices. It's 16 states that go from Maine to Puerto Rico.

And I'm joined today by O'Shell Howell. O'Shell works for region one and region two in the Philadelphia office as our financial chief (sic). Darren Kroenke works in our Chicago regional office in our Discretionary Grants Unit. And Roseana Smith works in our Dallas office, or the paired regions of Dallas and San Francisco, and really has been involved in a lot of our programs since coming to us from – actually, from the state of Arkansas.

So thank you to today's speakers for all your work developing the content and also taking the time to talk to us about it.

We have grantee practitioners that are going to be presenting with us today. Terri Burgess Sandu is from Lorain County Community College – LCCC – I believe that is in – near Cleveland, Ohio; Julie Sherman from Chippewa Valley Technical College; and Connie Wray from the Indiana Department of Workforce Development.

Again, these folks – when we came up with the idea for having this webinar, we really wanted to find folks that had rich experience in robust monitoring and we think we found three of them in our grantee presenters.

So what are our objectives today? Well, what is remote monitoring? We want to answer that question. When is it or isn't it appropriate to use remote monitoring? How is remote monitoring done? And are there any tips for success? So each of our presenters will have these questions in mind as we go through the material.

Now, I will share with you that we had over 500 folks registered for this webinar and we're currently at 366. Oh, there's a lot. And if you have questions, please use the main chat box. We will be monitoring that chat box for your questions. And don't become alarmed if we don't get to your questions immediately because we want to make sure we get through our material, but we are going to have time during the presentation to answer some of these questions.

One of the things I will share with you – and I think you'll hear a couple more times in this presentation – is that remote monitoring is a very valuable tool. And we at ETA have been using that for several years. Remote monitoring, however, is not a perfect substitute for onsite monitoring. There are times when remote monitoring makes a lot of sense and there's times when remote monitoring doesn't make as much sense.

And there are some special considerations you have to think about when you're using remote monitoring. And one of the key ones is that protection of the provided information, the information that you've received. Once you have it, storing it and ensuring that it is appropriately dealt with upon the conclusion of your monitoring is also important.

So with that said, remote monitoring is a tool that you can have in your toolbox. It is a tool that can really augment your onsite monitoring. And I will share that one of the things that ETA has done is allowed grantees a wide flexibility currently, with the COVID environment, to use remote monitoring in lieu of the onsite monitoring requirements. That isn't going to be forever.

So we will go back to requiring onsite monitoring when it is required by law, regulation, or guidance. But we do want you to know that remote monitoring is an option and can be a very powerful tool when you conduct your monitoring.

So we also want to leave time to answer questions. So those are today's objectives.

And I think now I'm going to turn it over to Roseana Smith in the Dallas-San Francisco paired region to talk to us about remote monitoring. Roseana?

ROSEANA SMITH: Awesome. Thanks so much, Leo. And I'm really excited to visit with you all today to talk about remote monitoring, because it is a great tool that you have in your tool chest. Whether you have a requirement to monitor onsite or you don't, it's something that can be used all the time to supplement your onsite monitoring and your overall monitoring strategy. So I'm really excited to talk to you guys about that today.

So let's take a look at what remote monitoring is. Remote monitoring is another way for you to evaluate the management and administration of a grant, to review the quality of the grant's program and/or services, to determine whether or not the grant is in compliance with all requirements, and to ensure achievement of grant goals and performance.

So this may sound pretty similar to onsite monitoring, right? Well, certainly the goals can be the same. But monitoring a grantee remotely can be an alternative to onsite monitoring when you have limited staff to conduct a review, your ability to travel is restricted, or face-to-face interaction isn't possible.

You'll want to check your grant requirements and consult with your federal project officer in the regional office if you're unsure of whether or not a remote monitoring review is appropriate. Some grants do require onsite monitoring of specific areas, as Leo mentioned earlier. And currently on ETA's website there is a COVID-19 frequently asked question regarding all grant administrative flexibilities that discusses fiscal monitoring of subrecipients, and it indicates that monitoring and oversight can take many forms and may include remote or desk monitoring.

Remote monitoring can also help prepare you for a more targeted onsite review at a later time, as you're going to learn a little later in this session from my colleague Darren. We'll talk about how remote monitoring may be a way to address an issue that can't wait for onsite review, or to evaluate a grantee's overall program so an onsite review can focus on a particularly challenging area.

So let's take a look at what the differences are between onsite and remote monitoring.

When you conduct an onsite review, you're able to meet in person with the staff at the grantee office. You're able to meet in person with businesses or with jobseekers or partners. You're able to review materials once you get onsite. So if there's – as you are conducting the reviews, there's something else that you need, you can ask one of the staff members to go grab it for you. You're able to actually observe activities and services that are going on, so you're able to look around and see those things to have discussions. You can get hardcopy documents.

One of the things about an onsite review, though, is particularly if you had to travel to get there, you may have limited time on site. So it's a restrictive amount of time that you're in that location and able to focus on the review. If you're in the middle of something and a question comes up, you can grab somebody and say, hey, can you help explain this to me? And do some ad hoc conversation.

And typically, again, if you've had to travel to your review, you're generally able to focus on the review the time that you're there and maybe not have as many distractions as you would have in the office.

However, when you review your grantee remotely, there's some things that you've got to kind of pay attention to that are a little different. So you'll need to schedule either video or telephone interviews. You'll more than likely be reviewing materials electronically; they'll be transmitted to you electronically and you'll be reviewing them different.

Typically a remote review is focused more on documents because you're not able to go and see activities that are going on. You're looking for written – or written evidence of those activities happening. You have to pay a little more attention to securing PII when you do a remote monitoring review because, when you're onsite, you can look at it and then put it back in a locked drawer; but doing it remotely, it's being transmitted to you.

With a remote review you do have flexibility sometimes to be able to span across several weeks. So you can devote a couple of days to it and then maybe you're doing a couple of days on something else and can kind of go back and forth. So you have a little bit – you can draw it out, have a little more time to conduct the monitoring review when you do it remotely.

As I mentioned a little earlier, you'll actually have to schedule time with grantees because you can't walk around the corner and grab them and say, hey, can you help me understand this? But you also are able to kind of juggle maybe multiple assignments. So you might be able to work on multiple projects while you're doing a remote review.

My Philly colleague, O'Shell Howell, is going to go through some of these things in greater detail. But first I want to let my buddy Darren in the great Windy City of Chicago talk about how you decide whether or not remote monitoring review is important. So Darren?

DARREN KROENKE: Thanks, Roseana. I appreciate it. Good afternoon, everyone. We're going to talk for a few moments here about when is or isn't remote monitoring appropriate? So as you can see by the details on the slide, this is really a case-by-case decision. There are some considerations that you're going to want to make as you determine whether onsite versus remote monitoring is appropriate.

There are risk analyses that you should be performing all along the way within a subaward or a grant's period of performance. That risk analysis is going to inform your decisions about what you need to focus on relevant to your remote monitoring practices. It will also help you to decide whether remote monitoring is appropriate or isn't appropriate, for reasons we'll go into in a minute.

Monitoring history is part of this analysis in this case-by-case decision making. Project complexity; we'll be talking about some of the elements of a grant project that might make it more conducive or more advantageous to doing remote monitoring versus waiting until you can do an onsite in that scheduling decision. And then there's some other considerations which we're going to cover.

So let's take a look at risk analysis. So in terms of risk factors, a lot of grants management is about identifying, addressing, remediating risk. So as you're beginning to develop your analysis and you're beginning to make a decision about monitoring and whether you're going to do something remotely or onsite, you really want to take a look at your risk assessment practices, the results of your risk assessment, the level of risk determined for the grant, and the specific indicators that you utilize in order to assess risk.

Typically you'll be looking at things like compliance with regulations and terms and conditions, laws or statutes. But you'll also be looking at programmatic elements. You'd be looking at the expectations that are communicated in the statement of work. You'd be looking at the progress that a grantee is making towards fulfilling deliverables and achieving results.

You'll also be looking at the financial management. You'd be looking at costs. You'll be determining whether those costs are appropriate, they're reasonable, they're necessary, they're allocable, they're well documented. But in terms of risk assessment, you really do want to focus any monitoring you do, whether you decide to do onsite or you decide to do remote monitoring, on those key areas of risk.

In terms of how risk applies to making a determination, there are some school of thought that say that low-risk grantees are some of the best candidates for remote monitoring. There's other schools of thought that say high-risk grants – or those that have more at-risk factors – require more immediate monitoring.

And maybe because of the circumstances that you're looking at, immediate monitoring is something that you can do relatively quickly, which is one of the advantages of an EDMR, or a remote monitoring review, is that you can do this without having to worry about the logistics of travel, that you can be more agile in terms of when you decide to monitor something.

But the risk assessment, irrespective of whether you are looking at a low-risk grant or you're looking at a high-risk grant, and the level of risk that's assessed – irrespective of that level, you do want to make sure that you use risk assessments as a means of focusing your monitoring.

The other points here in terms of OIG or other investigations, the status of the grant – if it's at its beginning or if it's at its midpoint or if it's at its end – or is there fraud, waste, or abuse, these are some other things that might come into your risk analysis in terms of what is the level of risk and what is the relative weight of issues? And how those issues will become the focus of your monitoring, based on where the grant is at in its period of performance and if there's been other issues that have arisen either through some sort of complaints that have been filed or some other sort of instances or suspected fraud, waste, or abuse.

But at any rate, what you're looking at is applying a risk analysis in order to make a decision both about what you're going to monitor and how the level of risk assessed impacts your decision as to whether an onsite review is the most appropriate thing to do, or you are able to do your monitoring effectively and compliantly using a remote method.

Monitoring history. The question that you see here – has the grantee been monitored before? And if yes, were there significant or prior monitoring findings or other areas of concern? This is something again that's going to help you make a decision about whether it's appropriate or not to do a remote monitoring review versus an onsite.

So when you look at history, you're looking at the organization itself. What's your relationship and your history of a relationship with that grantee or subgrantee organization? You're looking at the history of the project.

You're looking at how many times there has been some sort of monitoring conducted in order to make a decision as to, is this a grant that you want to schedule for monitoring in a shorter timeframe? Is it something that the urgency of monitoring is greater? Is the scope of the monitoring review going to be smaller or greater based on the history of monitoring, based on past monitoring experiences?

So it's important, obviously, to look at prior monitoring reports. It's important to look at the experiences that your monitoring team has had with this particular recipient and with their implementation of the grant project in order to determine, is onsite monitoring appropriate, versus a remote monitoring method?

The grant or project complexity is one of the next factors you should consider. So the things we're looking at here is, what is the scale of the project? Is this a project or a program that's focused on service delivery on a national level across states or regions?

Or is it something that's more focused within a state, maybe inter-regionally within workforce development areas or counties or regions or areas of a state? Or is it a very localized project, where services are going to be delivered and the bulk of the project activity is happening maybe within a zip code or a neighborhood?

But these are things you want to consider in terms of determining, is this something that can be done feasibly using a remote method? Versus what's gained or what's lost when you can or can't go onsite?

What's the number of subrecipients, contractors, or partners? Again, adding to the complexity of the project. If you're looking at a grant project that is functioning – or a grantee organization that's functioning primarily as a pass-through entity and there's a multitude of subrecipients, and that adds to the complexity of the project, then it may also limit what you are able to do when you're looking at something remotely.

Or it may also help you to focus the scope of your monitoring. Perhaps that monitoring is just going to focus on pass-through entity responsibilities, versus looking at some of the factors or some of the elements of what subrecipients are doing. But again, if there are multiple subrecipients and/or multiple contractors or partners, that complexity can be a factor in making a decision as to whether it's feasible, appropriate, or even effective to do a remote monitoring review versus an onsite.

The type of grant. This is another consideration. Is this a capacity-building project or is it a direct service project? You can anticipate, when you think about the difference in terms of outcomes for capacity building versus direct service, what might be some of the advantages or disadvantages of doing a review that's remote versus doing a review that's onsite? What are the things that you will be able to see or not see?

What are the things that you'll be able to assess or not assess based on the criteria that you're looking at in terms of capacity building or direct service projects?

And similarly, in terms of performance and expenditures, when you're looking at a low-performing grant versus a high-performing grant, or if you're looking at a project that is really struggling to meet its outcomes or its deliverables, those factors should also be considered when you determine are there elements of underperformance that you feel strongly you may only be able to effectively assess if you are able to do an onsite review?

Versus something that you feel comfortable that you can do an assessment, you can perform the analysis, you can determine either the compliance or the effectiveness issues that are within the scope of your review and its criteria by doing this remotely versus onsite.

Other considerations of course that you want to make. Availability of staff and participants and other stakeholders. That's something that you're going to want to think about especially in light of our current circumstances. Speaking from my own perspective as an Employment and Training Administration staff member, we've been considering this as we are scheduling onsite reviews – excuse me, remote monitoring reviews. Wanting to make sure that the staff that we would need to interview in order to complete the scope of the review are available.

Access to documentation is another consideration, especially in light of current circumstances, but it could be equally applicable if we weren't operating under a pandemic. What type of documentation are you requesting and does it exist in electronic form? Is this something that you're going to be able to receive digitally and is something that you're then going to be able to review easily in that format? Versus the type of documentation that you could think of might exist only in hardcopy.

Obviously, as grantees and as federal agencies we're trying to move more and more into a paperless environment. But if we're honest with ourselves, there's obviously still some documentation that's relevant to implementation of a grant project that you would still typically see when you're conducting monitoring in a physical format.

Scheduling flexibility. Other consideration that you want to make in terms of, as you're looking at the staff and their availability and what is going on with the project itself. Again, this is another consideration right now as a lot of organizations are in the process of trying to effectively transition into different methods of delivering services in light of the unusual circumstances that we're operating under.

So you do want to understand what those concerns are, what the staff and what the project looks like on the ground in order to make sure that you're scheduling any review – whether it's onsite or remote monitoring – appropriately.

And finally, what are the benefits and limitations of remote monitoring? Some of these things Roseana had already touched on. But in terms of benefits, this can obviously be completed with lower expense because you are not incurring the cost for travel. It can also be completed relatively quickly in terms of responding to an emergency issue.

Limitations. There's obviously some limitations in terms of the methods of inquiry and verification. When you think about what it looks like to be onsite and being able to put your eyes on something, whether it's participant service flow or some other physical aspect of a grant project or its implementation, you definitely are limited in terms of those methods of assessment or verification when you're doing something remotely.

You could be creative. You could request some pictures or some videos. But those are definitely things to consider in terms of how you would typically validate or assess compliance when you're onsite versus doing something remotely.

More rigid and discrete scope. This is something that I think first-time practitioners of a remote monitoring method come to realize that this is what I like to call monitoring by design. You really are very clearly identifying the scope that you're going to use, the documents that you're going to request as far as source evidence, and the staff that you're going to interview and the questions you're going to ask them.

So it doesn't lend itself well to serendipity and it doesn't lend itself well to just the coincidental type of issue that you might explore while you would typically be onsite or what might happen while you're onsite.

And depending on the system, some documentation, as we were saying, might not be available to you for review using remote methods, because it does not exist in digital form and may not be – easily be able to be converted into digital form.

And I now have the honor and privilege of turning this over to my colleague O'Shell Howell, who is going to cover how is remote monitoring conducted.

O'SHELL HOWELL: Thanks, Darren. So now that we've reviewed risk factors, we reviewed our internal mandates and requirements, reviewed our complexity of our grants, and have determined the benefits and limitations of remote monitoring, we've decided to move forward with remote monitoring in that we have a good environment for it.

Now, this breakdown that you see on your screen is not new. These are the same steps we use when preparing an onsite review. However, when monitoring – when the monitoring review is conducted remotely, these steps become even more important. Remote monitoring is successful but it's all about organization and planning. And those are the keys that we use for successful remote monitoring.

We start with our pre-work. So pre-work is – we talked earlier about doing the risk assessment and looking at the scope. But here we define the scope and pre-work. We look at those grants and their risk factors. We look at the pre-work areas as an opportunity to roadmap how our review would go. We target what we want to look at. We target the needs of the organization and we move forward.

After we target where we want to go, we then collect the source documentation. What type of documentation do we need for this review? What is the information that we need? Is it an organization chart? Is it internal policies and procedures? What do we need for this review?

And then what methods are we going to use for reviewing our source documentation? We're going to look at the development of the agenda in doing our pre-work for the review. At this point for remote monitoring, as Roseana spoke earlier – I believe Roseana spoke earlier – you can't just grab someone in the corner. So having your agenda specific with entrance and exit meetings is paramount to a successful review.

And then we always want to be respectful of everyone's time. So individual interview schedules are important. And when there are changes in those times, that we make sure we notate that and make sure that individuals who are responsible or who will be in those interviews are advised.

And lastly, protecting PII. This is key. We always want to protect our grantee and the recipients and our citizens' private information. We never want to put ourselves in a situation where we are sharing information that should not be shared without proper protection.

So we – (inaudible) – defining our risk analysis. What will be included in this review? Your risk analysis is different for every grantee. Is it financial? Is it programmatic? You have to look at your risk analysis through your review of your financial data and your programmatic data. Defining the scope, planning the call with the grantee when you discuss the agenda materials. Send the announcement and request for materials prior to the review.

For me in Philadelphia and for the – (inaudible) – there, we try to send out the announcement as early as possible for remote monitoring. We want to give our grantees – I'm sure everyone want to give our grantees as much time as possible to gather all the pertinent information and put it in a format that it can be shared. Again, ensuring that we are protecting personal information, but also respecting the time of our grantee.

So collecting source documentation. Collecting review material in advance of the review is very important. When the universe of the information is so big, so vast, it's imperative that this roadmap for the review is developed and targeted to key areas. So reviewing and analyzing documentation prior to the review, whether it's remote or onsite, I believe is paramount to organizing a successful process and review.

So we request our materials in electronic format when possible. That varies for different grantees. Some grantees have to go in and scan documentation and redact certain things and send it forward. Some allow us access. And so you have to look at your grantees and say, what is their capabilities and how can they provide you with the electronic documentation for this review?

If you can't pull the files directly from the system, what other tools can we share? Some tools we listed here are the Dropbox – a regular Google Dropbox – or to Max.gov, or whatever online platform that you currently have available to you.

The next one is important. Only request what is needed for the review. There is – it's very important – and I always think of myself when someone asks me for a lot of information and only needs something specific. During a review, we only want to ask for the information we need. If we – (inaudible) – our scope, we know exactly what to ask. And we only want our grantees doing that work that's necessary.

Again, and we'll mention it several times, remove PII. Remove it immediately so that we don't overlook or we don't send something forward that could put our grantee or our – (inaudible) – information in jeopardy.

Again, send the announcement request for materials weeks before we start. And receive and start reviewing materials two to three weeks in advance. I keep saying I call it a roadmap and in our office I always call it a roadmap. And so when you review that information in advance, you're more prepared to ask for what you need, you're more prepared to start your review with organization.

So now that we've done our pre-work, now we want to develop our agenda for the monitoring review. Again, we've included in the scope. We've included the timeline for the review and the objective of the review. It may be programmatic; it may be fiscal; it may be both. So we put all that information together.

And then next is schedule your interviews, your discussion, with your key grantees and subrecipient staff. Always keep in mind that when you go out the door – when you're conducting a remote monitoring, that those below you deserve the same schedule and interviews and respecting their time. Make sure that there is sufficient time for interviews and follow-up questions.

Keeping on agenda is helpful for ensuring that if there are issues that come up during the review, that we have time to go back and follow up. Your grantee will be able to go back and get you maybe additional information that you ask for, or clarify something that wasn't clear. So you always don't want to work up right in that review; you want to be able to allow that follow-up time.

And then lastly, communicate the agenda and scope with the grantee and subrecipients. Let them know what the expectation is and where you're going.

Again, we want to go into a little bit about the strategies for protecting PII. We want to make sure that you think about what type of PII might be in a file. And we know there are Social Security numbers, there are addresses, there is all kinds of information. And we have to be able to secure that information.

So you may have access to a case management system. Can that information be pulled from the case management system easily? And if so, is there a guest code that can be used so that it's easily usable?

If you use email files, what has to be redacted? Make sure that we're always safeguarded. It's never OK to issue documentation containing PII, so please make sure we secure that. I think I beat that horse down so we're going to move on.

So conducting remote monitoring. (Inaudible) – logistics. Is there a phone line that we need to secure? Is there anything that you need to conduct this review with a telephone call, video, screen sharing? What is needed? And then follow your agenda. Schedule your interviews and check-ins and make sure that you have your documentation review completed. And then we take notes.

And again, follow up. Make sure you allow that time to follow up. A lot of times we have findings that's in the review. We have issues that weren't covered. We have issues that aren't clarified. And it's better than during this remote monitoring that we set aside time to say, hey, I had some things to follow up on.

In this next section we're going to jump to some tools for conducting remote monitoring. We're going to review – we're going to cover some of the setup and the tools, and following the agenda and schedule, and taking notes. Notes are always important.

So test your technology. We've all been in a situation where we started our review and our screen doesn't share, our internet is down, there is something that happened. So it's always really good to test your technology before the review.

If you are using screen sharing technology, make sure that all parties can access it. Do each party have the capability to use the technology that you want to use for this review? Just because you have a certain capability doesn't mean that that capability is true for everyone or every grantee. If you're using video, make sure all parties know about the video.

Remote monitoring, as we've seen over the past few weeks, can be very scary for some. Some people don't know how to work the cameras, don't know when cameras are on. So we never want to put ourselves in that situation.

Schedule and organize reviews. Don't set back-to-back interviews. Allow yourself time. You'll want time to follow up with questions and to gather your notes on the meeting, as well as prepare for the next interview. You also want the person you're interviewing to feel relaxed and able to answer questions and not feel rushed. So make sure that you leave some time between interviews and discussion.

Make sure to have a checklist or a structure for your interviews to make sure you don't miss anything. Again, this is remote monitoring. And so it's not like you can grab them and say, hey, I forgot to ask you something. That goes back to rescheduling more time and taking more time. So make sure you use your checklist so that you can answer all questions a grantee or a subrecipient or anyone may have during the review.

And so organize files for review and sharing. You'll want to make sure that if you're reviewing files or sharing content on screen that you have them organized in an order that you can discuss and share them.

Following the agenda. You want to be sure that you are properly set up and have the tools ready for the review. You want to test technology – I'm sorry – before the review. I've already talked about that. Hold on. (Inaudible.) Here we go.

We want to stick to the agenda and stick to the schedule. Remote monitoring visits have a timeline just like onsite visits. We want to conduct interviews and meetings on time and again be respectful of grantee and subgrantee time. We want to conduct any file review following questions during interviews – follow-up questions during interviews and discuss with staff.

Reviewing the files ahead of time and jotting down any questions to help with the interviews and follow-up conversations is helpful.

And next is file documentation reviews and tips. Here in the regional office – here in ETA we have core monitoring guides. And that core monitoring guide is always shared in the areas we're going to review. And in those guides that are sent to you, there are different checklists and guides that have been provided and that are very helpful in helping organize your supporting documentation.

I'm sure there are other different files and document review tips that you may have. But make sure you review your program-related guidance. Make sure you use your guide and your checklist for reviewing the files that you receive. The checklist should be relevant to the file and to the information you're looking at, and relevant to the roadmap that you set forth. Make sure that you have your source documentation and that your information contained in your checklist contains your –

MALE: (Inaudible.)

MS. HOWELL: Sorry? (Pause.) And so lastly is follow up. Follow up file review with questions. We don't ever want to make assumptions. Whenever you are doing a monitoring, it's never OK to assume. And so you want to go back and ask those pertinent questions. Why something occurred. If something's not clear, go back and make sure you have documentation that supports what you're trying to say. And find whatever pieces are missing.

We call it the "why." We continue to ask "why" until it's over. Why is this happening? Why is this occurring? And you should continue asking the questions when you're on a monitoring review until the "why" is no longer. If you can't answer the "why," then you keep asking the questions. So when you leave and you end your remote monitoring, you have all the tools you need.

It's always easier to ask the questions in advance and while you're on a review, when you're in the moment. To go back and try to ask the questions that happen during your review is hard. It's hard for the reviewer and it's hard for the recipient of the review to try to figure out what you need. So when possible, ask the "why," get the clarification.

And then we have last our post-monitoring and our next steps. Issuing the report. It never feels good to go through all the work of preparing for a review and getting all the pertinent information, and spending the time with your reviewer, never to see what came out of the review.

The review is not just monitoring for compliance where we say, these are the things you're doing great, these are the things that need additional oversight; but it also is a tool that we can provide technical assistance. What else does this recipient need? What else do they need to be successful? What tools or what guidance can we share to ensure that we are securing the federal dollars and helping our recipients?

And then let's not forget to issue the report. The report is just like the report issued onsite. It includes your summary, description of any finding or key compliance issues, and the description of any areas of concern. Now, we always want to look at the concerns and we always want to address them, but it also lets you know what you're doing well. What are the best promising practices that you have out there? What are some things you can take away?

And then next we have resolving compliance issues. You want to note areas where the grantee may need additional technical assistance and ensure compliance (program ?). You may need to provide the grantee or the subrecipient with technical assistance, again to resolve any compliance issues. And the grantee must stick issues – resolve the issues that are outstanding.

Make sure you take time to work with the grantee and resolve all non-compliant areas identified in the report.

Providing technical assistance. So we talked about going through the monitoring review. We talked about it being a tool for compliance. But then we look at it as technical assistance. You want to determine what TA is needed. Is there a time and resources available for immediate TA during your remote monitoring?

Again, these things are scheduled, so this is something that will come up that's additional. Is there additional time in your agenda for any immediate TA? And if there's not, plan for a time where you can provide the TA. Determine the needs of that subrecipient or that grantee that you're reviewing.

At the end of the day, the monitoring review and the documented written notification is used to assist in the continuous development of the grantee and the success of the grant's performance. It assures programmatic and financial compliance.

And so thank you for today and I want to toss this over to Darren who will moderate our experience from the field.

MR. KROENKE: Thanks, O'Shell. I appreciate that. So as you've heard O'Shell go through in some very substantial detail – with some very good tips added along the way, I might say – the methods that you use for remote monitoring are in many instances – or in many ways, rather – similar to what you would do while onsite.

But conceptually, in terms of taking those methods and the strategies that O'Shell just described for us and putting them into practice, and that practice being implemented in a remote manner, we're very pleased to have with us today and it's my distinct privilege to introduce to you again our three presenters, Terri Burgess Sandu, Julie Sherman, and Connie Wray.

And without any further ado, I'm going to turn this presentation over to Terri. Terri, please.

TERRI BURGESS SANDU: Thanks, Darren. And thanks, everybody. I'm really pleased to have the opportunity to talk with you today.

So I do serve at Lorain County Community College. We're in Elyria, Ohio, about 30 miles west of Cleveland. My team has had the opportunity to lead a Round 4 State Consortia TAACCCT Grant from 2014 to 2018 with 11 partners. And we're currently managing a $12 million Scaling Apprenticeship grant, which also has multiple partners and subawardees throughout the state.

So we've learned a lot of this just the hard way, like many of you, and really pleased to share with we can.

My first piece of advice to all of you is we really drew heavily from experience of our colleagues. So please make sure you reach out to others in your network and ask for their input. Borrow their tools and their templates and their processes and make them your own. We really have benefitted from many of our colleagues in Ohio and across the country who have been really generous in sharing things that they've already developed where you can't find them. Many times DOL has already provided some of those great templates.

Of course, monitoring is both programmatic and fiscal. I'm going to focus more on the fiscal aspect of it. I think my colleagues who are also going to talk about – will talk more on the program.

So the number one thing, and I think you heard this previously, is that monitoring is really an ongoing process and it really does need to start early. And it's built on really building those strong relationships with the individuals who you are working with, with your partners. Not only your project managers who are out in the field, but the fiscal leads and the data and reporting leads. And making sure that each one of them individually really feels strong and confident in the work that they need to lead.

We did do a risk analysis for both, and so that is really helpful both to us and to the partners to understand where they see their own strengths and where they know they have room to grow, so that we can focus our technical assistance. Again, we do that on an ongoing basis.

We share the information on what happens during a monitoring visit early and we revisit it often. We do have a handbook for our project that, again, we borrowed from someone early on in our TAACCCT project and then made it our own and we've used it now for a couple different projects, of course tweaked for the specific grant source. But that handbook includes a detailed monitoring guide. So again, we don't want there to be any surprises.

And now that we're approaching the end of our first year, we will be revisiting that with the partners and we'll begin planning actually this summer for what those monitoring reviews will look like. We'll have the agendas – the sample agendas, the sample checklists, so that again our partners aren't surprised by any of this and are ready for when the time comes.

To help make some of that process easier for them, one of the things that we have used heavily is templates. So we have templates that we use with our partners and we ask them to use so that we have consistency in terms of the type of fiscal information that they're sending back to us. So we have a budget template, we have invoicing templates, we have match documents, that really helps us with making sure again we can compare apples to apples.

We've also gotten really good at document management and understanding that it's really important to give your partners clear guidance on document naming, document storing. We have a secure site for fiscal and administrative documents that requires more login than our communication platform, where we share more programmatic information that's easier to access.

And then we created a table of contents, quite frankly, because we've had a lot of information. And so making it easy for people to remember where they can find what.

So all of those things again are just tools to help make it easier for us and for our partners.

And before I turn it over to Julie I will say one thing about programmatic. For the quarterly report, with having – I think we have 12 different regions in our current project that we are gathering information from to submit to Department of Labor every quarter. So what we do is we have each partner complete a full quarterly narrative report and upload that into our system. And then we draw from that the highlights that we submit to DOL.

But that gives us a great resource to be able to track in real-time what each partner is doing. Are they doing what they should be doing based on their scope of work?

And so with that, I'll go ahead and turn it over to Julie.

JULIE SHERMAN: Thank you, Terri. A lot of what I was going to talk about Terri has already covered with the financial piece. But I'll give you a little background on Wisconsin.

Chippewa Valley Technical College is located in Eau Claire. We were privileged to get TAACCCT two, three, and four as a state consortium, so that included all 16 of our technical colleges. For TAACCCT four, Chippewa County was the lead college. And we were really fortunate because we had had the previous two TAACCCT grants to really build our relationships.

We currently have an H-1B TechHire grant with three technical colleges. And we've just been so successful because we've had a lot of time to work on our relationship building, our communication with each of the colleges. Like Terri at Lorain College, we have a lot of templates that every college uses so all of the information that is relayed is the same. When we have an enrollment form, we use the same enrollment form at all 16 colleges.

We also – I mean, I just kind of want to share that to really be successful I think you just have to have a lot of perseverance as well. You know, when you're dealing with 16 different colleges, you're dealing with 16 different grant managers, finance accountants, your different deans for different programs possibly, depending on what you're doing. And it was really important for my team to just be able to build those relationships.

Some of the tools that we used to do that, we would have – we still have monthly consortium calls. So depending on the size of the consortium – with the 16 colleges, we would have one college every month present on one of their best practices or something that they found really useful when working on the grant.

With our current grant, we have three colleges. So every month all three colleges give an update on where they are with their grant outcomes, how their spending is going, any roadblocks that they're running into. We've found as a consortium that really helps us keep track of what's going on.

As Terri said, ongoing progress monitoring, it's ongoing. This can't be something that you just do one-time deal and then back off and don't follow up on it. You really have to be monitoring all areas of the grant all the time.

We also have implemented monthly check-in calls with each college. This was a great way for me when I first got on the grant to build relationships with each college. I would have a little 15 minutes to a half an hour of time to find out how they were doing, any issues I could help them with. Just another tool.

I also think email management is huge. Knowing that if someone is going to email you that you're going to respond back in a timely manner is really important. I think it makes it more likely that your consortium colleges will reach out to you when they have an issue if they trust you that you're going to get back to them with an answer.

And then also, following up. When you do a virtual visit and you review documents, getting back to them is really important as well.

We also, as Terri mentioned, created an electronic quarterly narrative report for all of our colleges. We based off of – part off of the core monitoring guide but then also what was built into our grant. So that's another way that you can monitor quarterly how each college is doing.

And then for desk monitoring I just wanted to mention we actually took part of a review planning tool, basically, where we identified the activity, the objective, and the indicator, going off of what core activity it is and then what indicator was under that.

What it was – so for example, under core activity one, service design and delivery, you would have indicator 1.c.1, which is a sustainability plan. So then reviewing that sustainability plan and letting each college kind of know before going in and doing that desk monitoring what you're going to review, how you're going to review it, whether you're going to do it during the actual interview or if you're going to review it prior to that.

And I guess the last thing I would really just like to close with is that because we were able to learn from TAACCCT two, three, and four, and then now with this one, when COVID-19 happened a couple months ago I really feel like our college – our consortium was in a pretty good place. We haven't really had a lot of issues with monitoring because we had all of these tools in place already and the relationships were already built.

And I guess I actually did forget one thing I want to mention that I think is really important, is being transparent. So when you are a consortium and you're making decisions for 16 colleges, whether it's for program analysis or a fiscal review, you really want to be transparent in the decisions you're making, how you're making them, why you're making them, with all of the colleges. Because if you lose trust with them, you're not going to be as successful.

So thank you very much for giving me this opportunity to kind of share with Chippewa Valley has been doing. And I will now hand it over to Connie.

CONNIE WRAY: OK. Can everybody hear me, I hope? So my name is Connie Wrap and I am the associate chief of compliance and policy for the Indiana Department of Workforce Development.

And for the past several years we've focused primarily on my team of covering the WIOA Title I monitoring, so the annual onsite visit. But two of the things that I really wanted to talk about today were remote monitoring and how we already do some of that just in a normal process; and then also, a risk assessment tool that we use. And a little bit about how COVID has affected our processes and how we're really getting through any of that.

So just keep in mind that anything that I'm telling you is kind of Title I specific, but we are in the process of expanding our responsibilities and our functions within my unit. And I think a lot of the tools that we've developed and a lot of the things that we do will be able to carry over into some of the other grants and programs that we'll be responsible for overseeing.

So to get started, our Title I monitoring covers programmatic, fiscal, and the equal opportunity requirements for monitoring. And we already do a pretty heavy amount of desk review that starts about two weeks prior to an onsite visit. So under normal circumstances, pre-COVID, we would be doing desk review for a few weeks and then we would move on to the onsite visit.

So we start that process with a formal announcement letter that goes out to each of our 12 local areas that we have in Indiana. And that announcement letter outlines the schedule, the document requests that we want to ask from each region or local area, the instructions for submission – and that's where we cover some of the PII protection and make sure that any information that is submitted to us electronically is sent in secure means. We use Dropbox sometimes. We also let the local areas know that if they're going to be submitting anything to make sure it's encrypted or they redact PII and follow all those directions.

The announcement letter also includes any deadlines that we're going to have associated with any of the timelines of the monitoring. And anything that we do during desk review is just that; it's entirely remote. Again, it happens for about the two weeks prior to a normal onsite visit.

And some of the things that we do during that onsite prep, or the desk review process, is we collect internal – what we call SME feedback. So we poll internal people at our agency that are subject-matter experts, or SMEs, in various divisions and programs. Not just WIOA Title I but anybody that might have touched one of our local areas in some way with anything that we're about to go look at. And we try to find good things that they may be able to report to us.

We also try to find red flags that they may have – the fiscal team at our agency may have some reporting concerns out of one of the local areas. So we try to make sure as part of our desk review that we hit on those things. So we have a targeted list of questions that we ask to about 24 or 25 subject-matter experts internally first before we even reach out, really, to the local areas or the subgrantees to monitor them.

We also, during this two-week period prior to an onsite visit, we do document review. And that's where the fiscal team, the program team, and the equal opportunity team – (inaudible) – any documents that they have requested or tools that they have needed the local areas to fill out and send back to them.

We also do our participant file reviews. We do those random samplings and pull that information from our case management system. We do all of that remotely prior to an actual site visit. And then we also conduct a pre-visit risk assessment that sort of consolidates all of that information that we've done for those few weeks before a visit.

And so the pre-risk assessment – we call it the RAT, the risk assessment tool. We very lovingly call it the RAT. It's a living document that we have. We tweak it frequently as we figure out different things that we may need to put in there and new efficiencies. And I think what's kind of interesting about our approach to the RAT is that we do a pre one. And then after we've conducted monitoring, we do a post version of the RAT.

So very broadly speaking, that tool covers four main areas with several subtopics between each category. So we do a rating – low, moderate, or high – based on a point system that we've developed. And all of our tools are – or most of our tools, at least – I think are on WorkforceGPS, which will be covered at one of the end of the slides here at the end of the presentation.

But going back to the RAT. So the way that we have it set up, we have four broad categories. One focuses on the structure for the organization of that local area. Because again, remember, we're focused right now and historically on Title I grantees.

So we have a section on the structure of the organization. We look at, has there been any changes in the staffing to the board? Have there been any changes to the fiscal agent? Have there been any changes to the service provider? Has there been a lot of staff turnover? What kind of changes since the last time that we have visited them has gone on?

We also look at grant administration. And so that's where we – any comments on issues related to any of the programmatic, the fiscal, or the equal opportunity pieces, any comments that we may have received from the SMEs that were internal, all those get plugged into this risk assessment if there were good things or if there were negative things. And those get points assigned to them depending on what they are.

We also look if there's been prior monitoring findings or independent audit findings. We track through if there were issues resolving those. So all these things kind of have just a point system where they get dinged or un-dinged, which I'll talk about in a minute about the un-ding, which is kind of interesting.

We also have a governance section on our risk assessment tool and that's where we talk about local board composition, structure. We talk about the local plans – again, all WIOA Title I related. We talk about the oversight responsibilities of the board, any other governance pieces that a local board should be managing that we need to look at as we monitor.

And then in the risk assessment tool we also have a section for performance. And that's where we plug in all of the WIOA performance metrics and then also some state-specific metrics that we've selected that we want to track. And we plug all of those in.

So for that pre version of the RAT, we take everything that we know about a local area at that point in time, including everything that's been gathered from the documents they submitted, the SME feedback, prior monitoring history. And so we assign a pre-risk score to a region or to a local area.

And for us, that really arms us in terms of being able to go out to that region when we actually do interviews with them or talk face-to-face. And that gives us just kind of a good basis for are there concern areas that we need to hit harder? Or are there some really good things that we've learned from our internal SME feedback that we want to talk to them about?

Because we don't always want monitoring to appear to be a negative thing and we don't want to ever come out – (inaudible) – a hammer. We want to be there to help them.

So once we go onsite – so I know we're talking about remote monitoring, but I think this is kind of cool so I want to talk about it. So once we go onsite and we conduct our interviews, sometimes we have things that we may have dinged the local area for. Like maybe they had a turnover with their One-Stop operator. But maybe once we get there and we start talking to them, we realize that that new One-Stop operator actually has 12 years of experience from another state, so they know what they're doing. So we kind of mitigate.

On our tool we have a post score that we can kind of say, OK, you know, we went into this thinking that you were going to be a little risky in this area. But we came out of it – because we talked through it with you, we came out of it and we're going to take that point back away – or give you that point back.

So all of that goes into the post-RAT score, which is the score that is reflected in our official monitoring report that we release whenever we formally release the report.

So since we talked a little bit about what we do in desk review, and we talked a little bit about our risk assessment tool, I believe doing those things just as part of your normal monitoring process – even if you do have an onsite requirement – I believe that this has been really, really beneficial in preparation for onsite visits, both for efficiency purposes and because it allows us when we do go out and conduct an onsite visit, it allows a more conversational style approach where we're not sitting there having to check boxes and we can really talk more and we can really see more what's going on.

It can be a little bit more personal, if that makes sense. So I really like that it lands on that more conversational approach.

And having these procedures in place has made it much, much, much easier for us to switch gears during all this COVID things that have been going on. We have two remaining local areas that we have to monitor under Title I and both of those will be done entirely remote. So we already have all the tools in place that we need. Literally the only difference is we're not showing up in their local offices and seeing them face-to-face.

So our plan during this time for remote monitoring during COVID is to just utilize the current tools that we already have. But we've asked our fiscal and our EO and our programmatic monitoring leads to really look at the most important things that they need to get out of monitoring right now and to try to make a lighter version of what we would normally do, just to try to ease the burden on the grantees since they're dealing with reopening plans and (end-of-limit insurance ?) chaos at the moment.

And so we're really trying to target the remote monitoring right now during COVID based on what we might see on our pre-RAT and then any subject-specific stuff that our monitoring leads think that we need to cover.

So all that will still go into the final report, but that report's going to look a little bit different given the current situation. And we're OK with that. I think that it's OK that it's a little bit lighter as long as we still have done something. And I think that we – the fact that we already had a good process in place – at least where we are with Title I – a good process in place for desktop and remote monitoring. I think that that's really set up for COVID so it really didn't make it that harder on my team to be able to do that.

And so with that, I think that really – I think that pretty much covers the two areas that I wanted to talk about today, the what we already do for remote monitoring and then a little bit about our risk assessment tool. We have a ton of tools that we shared already that should show up on WorkforceGPS. Some of those are – Indiana built and then other ones we have very graciously borrowed and adapted from other states and we're very thankful for that.

We update the tools and modify them frequently. So some of the things – if anybody does go look at them, they might be a little outdated. Feel free to reach out to me or anybody on my team if you ever need or want to talk through anything, because we do have some good stuff out there.

And with that, I think I'm done and I'll turn it back over to Darren.

MR. KROENKE: Thank you so much, Connie. Thank you as well, Julie. And thank you, Terri. As you can tell from that presentation, there's a wealth of individual and collective experience here in remote monitoring methods. And we really again appreciate your sharing of those methods and strategies with the attendees on this webinar today.

I'm going to turn it over – or turn it back, I should say – to my colleague from the great state of Texas, Roseana.

MS. SMITH: I had to find my mute button. Thanks, Darren. And this has been a really awesome presentation. I'm seeing lots of questions and comments come into the chat. We've tried to address some of them in the chat. We'll also get a couple of my colleagues here and I will address some of them as well when we get in the question section. And they have some answers for some of you too here in this last section.

But if you do have any other questions, please put them in the chat. We'll work to see if we can't cover them before we jump off today.

So just want to highlight a few things that I heard today, some tips that we want to share with you to make sure that you're set up for success. So just kind of some summary of what my colleagues have talked about.

The first one just is that fiscal and program monitoring can be done remotely. As Leo mentioned at the beginning, remote monitoring is not a substitute for onsite monitoring, but it can be something that is very beneficial to your organization.

As I mentioned earlier, the COVID-19 FAQs on ETA's website, there is an FAQ on – a frequently asked question for all grants called administrative flexibilities. And it's kind of buried seven or eight questions down, but you'll see the question that talks about the requirement to do onsite monitoring and will give you the answer you're looking for as far as that being – you having the flexibility to do remote reviews right now.

Also, next tip is just that remote monitoring is a way that you're able to work more efficiently. So when an onsite visit isn't an option due to travel restrictions or timelines, you can do a remote monitoring review.

Remote monitoring reviews are a way to target risk areas, to narrow down issues and to target your compliance issues or technical assistance. We do want to remind you that compliance with federal and state monitoring requirements are still there. And so that's why you want to make sure that if you have any questions about that, that you talk with your federal project officer, reach out to your regional office. If you don't know who that is, it should be either in your grant agreement or in one of the modifications to your grant agreement, that there is – of who your federal project officer is. And they'll be able to provide you some additional guidance there.

And then just the last thing. If monitoring is required, there needs to be evidence that you did monitor. So if you're doing a – whether it's a remote review or an onsite review, there needs to be some kind of written documentation to support the review that you did. Typically that looks like a monitoring report; that's what you always get from the Department of Labor.

But maybe there's another way that you come up to document that. But you need to make sure that there is evidence that you actually conducted a review, that you provided what the findings were or areas of noncompliance were to your grantee, and that you're requiring corrective action. So it's a way that you can document that you completed that particular activity.

Some cool things that – again, in the bottom right-hand corner of our webinar today, you'll see a file share, and today's PowerPoint is located there. All of – so in the PowerPoint these things – yep, thank you, Jon, for highlighting that. All of these blue underlined things are hyperlinks that you can click on. So all of these resources are available to you.

One that we want to make sure you know about is ETA's core monitoring guide. So that is a guide that all ETA federal project officers use as the starting point for monitoring their grants. It will not give you the level of detail that you might be looking for because it is designed for any ETA grant. But it is a great starting point and provides overall guidance. It's what we all use when we are conducting a monitoring review. And it includes instructions about how to prepare for and conduct a review, what to do – (inaudible) – when you finish.

Again, though, it is written specifically for ETA staff. And so you'll need to make sure that you think through kind of what additional requirements you may have as a grantee. But it's a great starting point.

And then I'm going to highlight some resources that are located in that core monitoring guide as well. So if you download today's PowerPoint presentation, you will have the specific link to where that is located.

The next thing that I want to highlight for you is, on WorkforceGPS there is a community of practice called Grants Application and Management. So don't let the "grants application" part throw you off too much because once you've received your grant, it's also got a ton of information there about how to manage your grant.

And on that page there is a subsite called State Monitoring and Oversight Resources. And I'm going to show you a picture of that here in just a second. But all – we asked our states to share with us their monitoring tools and resources sometime last summer, I believe. And we provided – we've uploaded all of those onto WorkforceGPS so that you can find them. So I think many of Connie's tools that she mentioned, this is where you're going to find them.

So let me go ahead and flip to that next page. I'll show you what this looks like. This is a picture of what the Grants Application and Management community of practice looks like, and then the subsite on State Monitoring Resources and Tools. And if you scroll down a little bit further you'll see a link for state-specific tools. So right now that's how it's all organized; it's by state.

We recognize that some of these tools may be outdated. So you may want to click on the link and then maybe – worst-case scenario, Google the state workforce agency and see if you can figure out how to contact there. Shoot them an email and you'll get in touch with the right person.

But what we would really love is for all of you – all 500 of you that participated in today's webinar – for you to share your resources with us. We recognize that we have many discretionary grantees on the call today and we can work to make sure we have a specific location for discretionary grant monitoring tools and resources.

But if you want to send them to us, you've got the email link right there on the screen. It's support@workforcegps.org. And then just in the subject line if you would mention specifically the Grants Application and Management community of practice so that we can know where the information needs to go. And ideally, you have the information on your website and you'll just send us the link. And then that way, when you update the tool, the link will still be active.

So WorkforceGPS really is just a way that we're able to direct people back to you all to be able to see the things – to share resources with each other. So we want to make sure that it stays updated. But it's also really challenging to keep all the links updated. So if we can just direct them to your website and then you update your links, then everybody can make sure they have the most recent document.

So hopefully that – the things that are there will be useful to you. And then we really hope that you would share with us your resources that you have so that we can share them with other people.

The core monitoring guide is something I mentioned a little bit earlier. There's a number of resources in the core monitoring guide that, again, ETA staff use. So examples of documents that we request. The analysis for onsite monitoring, so how you're preparing for that. Kind of a template for all the components that we look for in writing a monitoring finding. There's some WIOA participant checklists, a budget comparison tool. You guys can see the list here. But there's a number of tools and resources there that you might be able to take and target for your needs.

And so I think with that I'm going to jump over to some of the questions we got in the chat. And we've got just a few minutes to try to wrap this up and to answer some of your questions.

So one of the big things that we saw early on in the presentation was about PII and how to ensure that you are protecting PII. So O'Shell, you want to tell us a little bit about that?

MS. HOWELL: And so when we look at PII, we definitely want – our guidance here definitely speaks to TEGL 39-11. And it speaks to that personally identifying information and how we protect. We look at the protected and the non-sensitive information.

First and foremost, you want to look at your internal policies and procedures. Because while we have TEGL 39-11, your individual internal policies and procedures may be more strict than what ours is. And for us, we look at that FIPS 140-2 requirement where it mandates that the information – digital information is encrypted. And so we – if you have questions, look at 39-11.

The question specifically asks about mixed guidance and that's why I want to make sure that you look at your internal policies and procedures and then ensure that your internal policies and procedures are following the required specifications outlined in 39-11.

And then there was another one. There was two with PII. I think we answered them both.

MS. SMITH: Perfect, O'Shell. Thanks so much. Hopefully that gives you guys the information you need. And again, just reach out to your FPO if you still are struggling with figuring out how to navigate the PII requirements.

The next couple of questions we received – we received several questions about tools. I'm hopeful that I answered many of those in pointing you to our WorkforceGPS community of practice.

We had seen – there was one person mentioned tools about the law and policy. You will find some of that, particularly related to the uniform guidance, in our core monitoring guide. So our core monitoring guide has three sections. The first one is really focused on the program side of things. And because it's not a program-specific guide, it will not have citations in it for you.

So core activity one is on service design and delivery. Core activity two is on grant operations, and that includes a lot of citations about the CFR. And then core activity three is on financial management and it includes the citations from the CFR and some TEGLs are cited in there as well.

So we see that we've got copies – a question about fiscal templates as well as checklists and guides. What we're going to do is ask our colleagues who presented today to share their resources with us and we'll get them posted up on WorkforceGPS. And we'll make sure that we include – well, the link is included in the PowerPoint that you have on where that community of practice is. And we'll get that uploaded.

OK. Next set of questions I think that we had related to the risk assessment. So Darren, you want to talk about that?

MR. KROENKE: Sure. Thanks, Roseana. I think Connie did a really good job of providing some examples of risk determination utilizing an assessment strategy that identifies requirements or criteria that the state of Indiana has placed into subawards with local workforce development boards and other entities.

But applying that same concept to both formula and discretionary grantees equally, you're essentially looking at what criteria are you requiring? What are the elements of risk that are important to this subaward or to this grant agreement that you have as a grantee or a pass-through entity?

So it's not something that is generic, per se; it really is specific in terms of you need to develop a risk indicator assessment that identifies areas of potential risk, programmatic and financial – because the question asked about, is this something that should be done by both program and finance? And the answer is absolutely. I always like to say that there's a nexus between the two. You don't have one without the other.

And in fact, in effective grants and project management, both elements of implementation or management of the project should be done together. There's really not an effective way to silo a program and finance.

So it is something that you will design yourself. It's something that you will then implement in order to determine what, to you, constitutes low-risk versus medium-risk versus at-risk or high-risk. Even those names or those terms are really – the symbolic value of them is very much up to you in terms of what you as a grantee organization or a pass-through entity determine is low-risk versus medium versus high. You don't even have to use those terms.

But essentially, you're going to determine what are the areas of risk you're analyzing, perform the analysis, assign a risk level, and then use that to focus your monitoring itself. And also, like I was saying earlier in the presentation, to determine whether the outcome of your risk assessment suggests that doing remote monitoring is maybe appropriate or not appropriate, given the types of risk that you're analyzing and the level of risk that you've determined.

MS. SMITH: Awesome. Thanks, Darren. So the last question that we have time for today, "How does remote monitoring stay in compliance with WIOA Act requiring onsite monitoring of the WIOA program?" O'Shell, you want to talk about that?

MS. HOWELL: Yeah. Thank you, Roseana. You're absolutely right. First you want to look at the WIOA Act and what's required for discretionary grantees. You want to look at your grant terms and conditions and make sure that it's something that's available – allowable at the time.

But we're in different times. And so what we are suggesting is that you go to our FAQs. And I think we have a link right now provided. Knowing that during this time there have been certain allowances and abilities for remote monitoring and different compliance relaxation to – different compliance have been relaxed during this time.

So it's not a yes or no answer. I think we need to make sure you follow that link that deals with the COVID questions for that.

MS. SMITH: Awesome. Thanks, O'Shell. And again, just if you are not able to find the answer to what you're looking for, you can reach out to your federal project officer and they can work to get the information for you.

Unfortunately, we did not include our contact information in this webinar. But you can reach out to your federal project officer and if they aren't able to get the answer, they'll reach out to one of us and we'll be able to support them on that.

So we are so thankful that you all joined us today to learn about remote monitoring. We're excited to see how remote monitoring works for you all, as you work to monitor your subrecipients and come up with innovative and creative ways to continue monitoring in these unprecedented times right now.

So please share with us the tools that you come up with. We did have several of you say that your organization has been doing this a long time and that you're experts at it. And so we want to learn from you and we want to help share your information with your other colleagues. So please make sure to send us those resources. We'll get them uploaded to WorkforceGPS.

And with that, I'm going to turn it back over to Jon.

(END)