



ARKANSAS DEPARTMENT OF FINANCE AND ADMINISTRATION  
OFFICE OF INTERGOVERNMENTAL SERVICES

**SUBGRANT ADMINISTRATION GUIDE**  
**PART II: POST SUBGRANT REQUIREMENTS**

**J. MONITORING**

1. **PURPOSE**

Pursuant to state and federal regulations, the Department of Finance and Administration, Office of Intergovernmental Services, Victim Justice and Assistance Program (VJA) is required to conduct regular evaluations of subgrant organizations receiving funds through the VOCA, FVPSA, and STOP federal grant programs. The purpose of these evaluations is to ensure compliance with the applicable statute(s), program guidelines, fiscal accountability, and other subgrant agreement terms and conditions, and to ensure the delivery of effective and quality services to victims of crime.

2. **METHODS OF SUBGRANT MONITORING**

Subgrant monitoring is used to review victim service delivery performance data; timekeeping and equipment records, as well as documentation of costs supported by federal funds. Subgrant monitoring provides an opportunity to review the qualitative and quantitative performance of a subgrant award. A minimum of fifty percent (50%) of subgrant organizations receive an on-site visit annually. Fifty percent (50%) of the on-site visits conducted are formal on-site monitoring visits (see description below), while the remainder are informal visits. To determine which subgrant organizations will receive formal monitoring visits, a risk assessment is used. The risk assessment includes such items as amount of funds received, utilization rate, staff turnover, etc.

Subgrant monitoring is an on-going process that involves one or more of the following:

- a. **Enhanced Program Desk Review (EPDR) monitoring** includes a review of invoice submittals and supporting documentation, a review of quarterly performance reports, e-mail transmittals, telephone calls, and any other documents or communications that may flow between the Project Monitor and the subgrant organization.
- b. **On-site monitoring** provides a first-hand look at the subgrant organization's operations. It is an opportunity to meet the management and staff, establish a positive working relationship, and to review the subgrant organization's files and documentation.

Several types and purposes exist for on-site monitoring, including:

- i. Formal on-site monitoring are scheduled visits, utilizing a standardized monitoring tool to access the program's compliance with federal and state rules, fiscal management procedures, and organizational structure.
- ii. Informal on-site visits may be conducted at any time. The purpose of these visits is to meet staff, observe macro-operations, learn about program activities and provide any needed technical assistance.



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- iii. Evaluation on-site visits are used for first time subgrant organizations in order to meet staff, evaluate and give guidance regarding the structure of the organization, program administration, service delivery, community support, and compliance with federal and state rules, as well as, fiscal management procedures.
- iv. Intervention on-site visits are conducted as needed, to provide technical assistance and direction to subgrant organizations experiencing performance or fiscal problems. Except in cases warranting immediate intervention, other grant management methods such as desk monitoring, written correspondence, and telephone consultation will be tried before an intervention visit is scheduled.
- c. Complaints regarding a subgrant organization are investigated within the parameters of the subgrant agreement and/or applicable statute or rule.

**3. SUBGRANT MONITORING TOPICS**

In conducting a subgrant monitoring, VJA addresses various aspects of a subgrant organization's compliance with subgrant requirements and special conditions, by reviewing the following documents:

- a. Personnel records - includes paid and volunteer staff providing services.
- b. Client files - the records of service recipient.
- c. Financial records - including source documentation for subgrant expenditures and match.
- d. Policies and procedures - organization, as well as program policies and procedures.
- e. Board of Directors' meeting minutes.

**4. PROGRAM REVIEW**

In addition to a review of documentation and necessary facility inspections, VJA may also interview staff regarding the provision of services. Staff can include the agency director, federally funded staff, and administrative staff responsible for contract reporting and bookkeeping. This will provide an opportunity to talk about the services being provided to crime victims and other aspects of the program services. In some instances, there may be a need to interview victims.



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**5. ON-SITE MONITORING PROCEDURES**

- a. **Notification:** Prior to a *scheduled* on-site monitoring, the authorized official of the subgrant organization will be notified via e-mail. The e-mail will include a list of documents to be reviewed prior to and at the visit, time of the review, space needed by the reviewer, identification of subgrant organization staff needed, and a copy of the monitoring checklist.
- b. **Pre-visit:** Project Monitor will review all reports previously submitted by the subgrant organization, as well as the documents requested in the notification e-mail. The review will include the timely submission and accuracy of required reports.
- c. **Site visit:** Project Monitor will conduct an *entrance interview* with the authorized official, program director and any other staff and/or Board members in attendance. The purpose of the entrance interview is two-fold: to inform the subgrant organization of the purpose of the visit, indicating what will be reviewed and to give the subgrant organization an opportunity to discuss any issues or concerns it may be experiencing with regard to the subgrant.
  - i. The Project Monitor will complete the Monitoring Checklist by reviewing the subgrant organization's policies and procedures, personnel and victim files, and by interviewing administrative, management and direct care staff, as well as, if appropriate, victims.
  - ii. An *exit interview* will be conducted at the conclusion of the visit to inform the subgrant organization of preliminary findings<sup>1</sup>.
- d. **Post-visit:** Following the on-site monitoring visit, the Project Monitor completes a written report of findings. The report is a qualitative and quantitative analysis of the organization and operation of the subgrant. The report will highlight the subgrant organization's accomplishments and successes, indicate areas requiring technical assistance, and areas of deficiencies discovered during the visit. The report will also contain suggestions for improvement.
  - i. Any areas of deficiency will require the submission of a corrective action plan by the subgrant organization. The corrective action plan will detail how the deficiency will be corrected and give a time frame for completion.
  - ii. If a subgrant organization does not agree with the site visit findings, it may appeal the submission of a corrective action plan by giving written notice, within 10 days of receipt of the report, to the VJA Program Manager describing in detail its reason for disagreement.

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<sup>1</sup> Preliminary findings may not be all-inclusive; therefore please note that issues discussed at the exit interview in no way negate other issues/concerns/deficiencies cited in the formal report.



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- a) The VJA Program Manager will review the appeals request, the disputed information and, if warranted, meet with representatives of the subgrant organization to further clarify the stated issues.
- b) The VJA Program Manager will provide the subgrant organization a written notification of the outcome of the appeal. The possible outcomes include:
  - 1) A determination that the appeal was not submitted within the established deadline and find against the request for reconsideration.
  - 2) A determination that the appeal did not show sufficient cause for reconsideration and find against the request for reconsideration.
  - 3) A determination that the appeal did show sufficient cause for reconsideration. If sufficient cause is justified, the VJA Program Manager may meet with the Project Monitor and provide guidance in the disputed area, and require that the report be re-written, omitting the disputed areas.
- e. Follow-up: The Project Monitor is available to assist the subgrant organization in correcting any deficiencies, as most are not intentional, but rather the result of lack of experience or misunderstanding of what is expected. Follow-up may be in the form of telephone or e-mail communication, another site visit and/or referring the subgrant organization to additional resources.
  - i. Subgrant organizations will be provided with a *Customer Service Survey* to indicate their thoughts on the monitoring process and to provide feedback to VJA to improve the process.

**6. SCHEDULE**

On-site monitoring will be scheduled as follows:

- a. Current Subgrant Organizations are those who have had a subgrant with VJA within the previous three (3) years, are subject to an on-site monitoring visit, at least once in a three year period, however desk monitoring will occur at least quarterly.
- b. New Subgrant Organizations have never had a subgrant award with VJA or an organization with whom VJA, has not contracted with in the previous three (3) years, or a subgrant organization with new executive staff shall receive an on-site monitoring visit within the first year of the subgrant start date.



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- c. New Type of Service – If the subgrant organization is a current subgrantee of VJA, but the service to be provided is new for the organization, an on-site contract monitoring visit within the first year of the subgrant start date is discretionary on the part of the VJA Program Manager.
- d. Issues or Concerns – If there is a significant issue or concern with a current subgrant organization regarding contracted services, an on-site visit distinct from a regularly scheduled visit is discretionary on the part of the VJA Program Manager, unless the circumstances warrant an on-site review.
- e. Complaints – Where the VJA Program Manager is investigating a complaint against a subgrant organization, an on-site visit for investigation purposes will be conducted as circumstances warrant.