

## Common On-Site Monitoring Review Findings for DOL Grants

FINDING / CRITERIA	REGULATION	PERSON RESPONSIBLE	ESTIMATED COMPLETION DATE	ACTUAL COMPLETION DATE
<p><b>Changes were made to the Statement of Work (SOW) without Grant Officer Approval (outcomes/activities etc.) e.g. adding or removing new partner school sites that have not been approved by the Grant Officer.</b></p> <p><i><b>Criteria:</b> Any changes made to the SOW require prior Grant Officer approval.</i></p>	<p>Grant Award Agreement Part IV – Special Conditions #1</p>			
<p><b>The Equal Opportunity (EO) requirements are not being fully implemented:</b></p> <ul style="list-style-type: none"> <li>▪ <b>The EO notice does not contain the required wording.</b></li> <li>▪ <b>The EO notice is not posted or provided to participants and made a part of their file.</b></li> <li>▪ <b>Program brochures/outreach materials do not contain the required wording.</b></li> </ul> <p><i><b>Criteria:</b> An EO Notice with required wording must be posted / disseminated. A copy of the notice must be placed in participant files. All program brochures, outreach materials, job announcements and other materials must include specific wording.</i></p>	<p>29 CFR 37.30 EO Notice Wording</p> <p>29 CFR 37.31 EO Communication, Dissemination</p> <p>29 CFR 37.34 EO Wording in Publications</p>			
<p><b>Expenditures are not being reported to ETA on an accrual basis.</b></p> <p><i><b>Criteria:</b> Financial data on ETA-9130 (Financial Status Report) must be reported to DOL on an accrual basis.</i></p>	<p>29 CFR Part 95.21(b)(1)</p> <p>ETA-9130 Reporting Instructions</p>			
<p><b>The grantee is not complying with the <b>25% match requirement.</b></b></p> <p><i><b>Criteria:</b> Establish a method to track and document match resources contributed towards the grant. Report match contributions from all contributors on the ETA-9130 Financial Report on lines 10j – 10n each quarter.</i></p>	<p>29 CFR Part 97.24</p> <p>ETA-9130 Reporting Instructions.</p>			

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<p><b>The grantee is not tracking and reporting administrative expenses charged to the grant. A special provision in the grant establishes a 10% limit on administrative expenditures.</b></p> <p><i>Criteria: Establish and implement a method to track administrative expenses. Report administrative expenses on the quarterly ETA-9130 Financial Report under line 10f.</i></p>	<p>20 CFR 667.220 (b) and (c)</p> <p>ETA-9130 Reporting Instructions.</p>			
<p><b>Grant funds were used to purchase equipment without Grant Officer approval.</b></p> <p><i>Criteria: Equipment in the amount of \$5,000 or more that has a useful life of one year or more requires prior Grant Officer approval.</i></p>	<p>Grant Award Agreement: Part IV – Special Conditions #2</p>			
<p><b>The Grant Recipient realigned the budget without Grant Officer Approval.</b></p> <p><i>Criteria: Flexibility is allowed within the grant budget (except personnel, fringe benefits, indirect costs), provided no single line item is increased or decreased by more than 20%. Changes in excess of 20% and <u>any</u> changes to personnel, fringe benefits or indirect cost line items must receive prior written approval from the Grant Officer.</i></p>	<p>Grant Award Agreement Part IV – Special Clauses #1</p>			
<p><b>Grant Recipient does not conduct monitoring of subrecipients and/or have a monitoring system in place.</b></p> <p><i>Criteria: Grant Recipient is responsible for managing and monitoring each project, program, subaward, function or activity supported by this grant.</i></p>	<p>29 CFR Part 95.51(a)</p>			
<p><b>Procurement files do not contain required support documentation.</b></p> <p><i>Criteria: Procurement records and files shall include the basis for contractor selection, justification of lack of competition and a basis for award cost or price.</i></p>	<p>29 CFR Part 95.46</p>			

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<p><b>A Cost or Price Analysis was not conducted for services procured.</b></p> <p><i>Criteria: Grant Recipient must perform and document cost or price analysis for every procurement action.</i></p>	29 CFR Part 95.45			
<p><b>Acknowledgement of Funding Source is missing.</b></p> <p><i>Criteria: The following text must be displayed in all publications, outreach materials, etc. related to grant-funded activities and projects:</i>  <i>"This project was funded (in part, as applicable) by a grant awarded under the Youth Career Connect Program in the amount (enter amount), as implemented by the U.S. Department of Labor's Employment &amp; Training Administration."</i></p>	Grant Award Agreement Part IV – Additional Provisions			
<p><b>Project Significantly Behind Schedule in Achieving Grant Outcomes/Deliverables.</b></p> <p><i>Criteria: Grant recipient should have a strategy to ensure that all project outcomes/deliverables are completed within the grant performance period.</i></p>	Grant Award Agreement, Part I, Statement of Work			
<p><b>Quarterly Financial (9130) and Progress Reports are submitted to ETA after the reporting deadline.</b></p> <p><i>Criteria: Submission of the Financial and Progress Reports is due on a quarterly basis. Reporting quarter end dates shall correspond to the following calendar quarter end dates; March 31, June 30, September 30, and December 31. Quarterly reports are to be submitted no later than 45 calendar days after the end of each specified reporting period.</i></p>	Grant Award Agreement, Part IV, Special Conditions  ETA-9130 Reporting Instructions			