

Florida Department of Law Enforcement
2018 CJIS Annual Training Symposium

Monitoring and Compliance for DOJ Subawards



Agenda

Section I: Risk Assessment

Section II: Monitoring

Section III: Compliance Requirements

Section I



RISK ASSESSMENTS

Risk Assessments

2 CFR §200.331

The purpose of this assessment is to:

- **Evaluate risk of non-compliance with award requirements and conditions**
- **Determine appropriate level of monitoring needed**

Risk Assessment Elements



Section II

Monitoring

The background image shows a person's hands in a light blue shirt placing a red LEGO block with the word 'COMPLIANCE' on top of a stack of four grey LEGO blocks. The grey blocks are labeled from top to bottom: 'REGULATIONS', 'CONTROL', 'STANDARDS', and 'POLICY'. The scene is set on a wooden table with other scattered LEGO blocks.

Pass-through Entity Monitoring Requirements

A pass-through entity must:

- **Develop policies and procedure regarding subrecipient monitoring**
- **Conduct monitoring in accordance with federal program requirements**
- **Review programmatic and financial reports**

Pass-through Entity Monitoring Requirements

A pass-through entity must:

- **Ensure subrecipients comply with single audit requirements**
- **Follow up to ensure subrecipients address deficiencies in a timely manner**
- **Issue management decisions on noted deficiencies**

Phases of Monitoring

NEW!

Pre-Award

- Eligibility
- EEO
- Policies
- Procedures
- Controls

Post-Award

- Programmatic
- Financial
- Compliance

NEW!

Closeout

- Reconciliations
- Audit reviews

Monitoring Types

Pre-Award

Post-Award

Closeout

NEW!

Level 1

- Desk
- Simple Projects
- Random Sample Expenditure Review

Level 2

- Expanded Desk
- Moderate Complexity Projects
- Biannual Expenditure Review

Level 3

- Site Visit
- Complex Projects
- 100% Back-up

Monitoring Process

FDLE
conducts risk
assessment.

Subrecipient
provides all required
information.

**Corrective
Action**
(if applicable)

Subrecipient
notified of
monitoring.

Grant Manager
completes
monitoring report.

1

2


3

4

5

Section III

Compliance Requirements



Compliance Requirements

Federal Registrations / Verifications

- **DUNS / SAM.gov**
- **Lobbying (\$100,000 +)**
- **Debarment & Suspension**

Compliance Requirements

Project Certifications & Forms

| | |
|----------------------------------|--------------------------------|
| Bulletproof Vests | Body Cameras |
| Confidential Funds | Sole Source |
| Automated Data Processing | Accreditation Standards |
| NEPA/DEP | |

Compliance Requirements

Civil Rights

- **Certification, EEO Plan, and/or Approvals**
- **Written policies and procedures**
- **Civil rights training to employees and participants**

Compliance Requirements

Civil Rights

- **Consent decrees**
- **Limited English Proficiency (LEP)**
- **Methods of Administration (MOA)**



Compliance Requirements

Financial Management & Internal Controls Accounting System

- **Account coding**
- **Fund Tracking by Budget Categories**
- **Match Tracking**
- **PGI/Interest**
- **Cash on Hand**
- **Separation of Duties**

Compliance Requirements

Financial Management & Internal Controls Property Standards

- Item description & Tracking number
- Funding source & Grant Number
- Acquisition date & Cost
- Location
- Inventory Frequency
- Disposition

Compliance Requirements

Financial Management & Internal Controls Procurement

- **Policies & procedures**
- **Federal requirements compliance**
- **Competitive selection**
- **Excluded Parties List**

Compliance Requirements

Financial Management & Internal Controls

Miscellaneous

- Travel Policies
- Subrecipient management & monitoring policies
- Supplanting
- Time & Effort Reporting



Compliance Requirements

Multi -Tiered Recipient Requirements

- Eligibility Verification
- Relationship Determinations
- Contract/award preapproval
- Consultant rates
- E-verify for contractors

Compliance Requirements

Multi-Tiered Recipient Requirements

- Subrecipient management policies
- Subrecipient risk assessments
- Subrecipient monitoring tools
- Non-governmental organizations management

Compliance Requirements

Reporting

- **Expenditure**
- **Performance**
- **Fraud Waste and Abuse**
- **Single Audits**

Contact Information

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