

Policy: Monitoring Grants Management and Compliance	Category: Monitoring and Audits		Number: GP2400
	() Complete Revision () Partial Revision (X) New	Supersedes:	Page: Page 1 of 3

Policy Statement

The School District of Philadelphia is committed to ensuring that oversight of the business processes related to grants allows for timely identification and correction of errors, improves the likelihood of compliance, and reduces the risk of returning unused funds to the grantor(s). To this end, the District will use a standardized approach to monitor key grants management and compliance processes.

Reason for Policy

Adequate monitoring increases the District’s ability to effectively and efficiently execute grant programs and aids in identification and correction of problems in a timely manner, thereby reducing the risk of compliance violations. A system developed to monitor and track grant management and performance allows for better founded management decisions, adequate budget adjustments, realignment of resources, adoption of new strategies, streamlining of operations, and recognition of success. A performance accountability system will increase the likelihood of programs meeting stated goals as well as the likelihood of continued funding.

Policy Requirements

The foundation for monitoring compliance is the **Program Compliance Monitoring Plan**. Upon successful grant award approval or renewal, each program will be required to develop (or update, if it is a renewal of an existing award) a Program Compliance Monitoring Plan. The purpose of the plan is two-fold: 1) to aid in identifying the critical risk areas of each grant and address how best to effectively manage those risks, and 2) ensure that the award’s compliance requirements are met throughout the life of the grant.

While each grant program is subject to different program specific regulations and requirements, all federal grants have the same cross-cutting requirements as contained in the Uniform Grant Guidance at **2 CFR Part 200**. The **Program Compliance Monitoring Plan** is designed to monitor for those cross-cutting requirements AND specific program requirements. When a grant is awarded or is to be renewed, the grant writing team (See **GP0100.2 Writing and Submitting Grant Applications**) consisting of the Grant Program Manager (GPM) or Principal, the assigned Grant Compliance Monitor (GCM), Grants Budget Analyst (GBA), Grants Accounting Staff and other program related District staff will convene a Grant Implementation Meeting to:

- Identify and understand grant requirements
- Perform a grant compliance risk assessment
- Use the risk assessment to develop a **Program Compliance Monitoring Plan**
- Plan the conduct of compliance evaluations using the **Program Compliance Monitoring Plan**
- Develop or refine methods and tools for monitoring and mitigating identified risks

GCMs will also create a Supplemental Monitoring Plan for schools to assess their compliance with the creation of a Schoolwide Needs Assessment and Planning Addendum. This effort moves the GCO into compliance monitoring for programmatic elements of Title I requirements. Deficiencies will be noted and raised with both the school Principal and the **Office of Federal Programs (OFP)**, reporting to the Chief of Academic Supports, in order to take corrective actions.

Responsibilities

Grant Program Manager (GPM) or Principals participate in the creation of the **Program Compliance Monitoring Plan**. GPMs have ultimate responsibility for managing and overseeing the grant program's financial and programmatic activities in accordance with applicable regulations and guidelines established by the grantor as well as any specific District policies or requirements. GPMs or Principals will have their management results evaluated and are responsible for reaching out to GCMs or the Grant Compliance office (GCO) if they are unable to meet program requirements.

GCMs, are also responsible for the creation of the **Program Compliance Monitoring Plan** and will oversee global compliance of their assigned grants. GCMs will use the **Program Compliance Monitoring Plan** to identify grant staff or programs struggling to meet compliance requirements. GCMs will provide support to the GPMs and Principals and are expected to provide reasonable assistance and training to help improve program compliance. GCMs will work with the Grants Governance Committee and its members to determine an appropriate course of action when high-risk programs are detected and are unable to be corrected. Additionally, due to the high risks of compliance violation, GCMs are responsible for authorizing all expenditures and confirming allowability for schools or programs.

The OFP is responsible for training and supporting SDP school Principals and staff on the development and implementation of schoolwide needs assessments, plans, and related activities under the Every Student Succeeds Act (ESSA).

OMB Grant Budget Analysts (GBAs) have primary responsibility for ensuring grant budgets are set up accurately and properly within the District's Advantage financial system and that financial transactions of the program are recorded accurately. GBAs will ensure that grant reports and information necessary for effectively managing and monitoring grant activities are prepared and submitted to the GPM in a timely manner. GBAs also have a responsibility to understand applicable grant regulations and guidelines and assist the GPMs in identifying and correcting errors and submitting reports.

Grants Accounting Unit of the Comptroller's Office is responsible for ensuring proper account codes are created during budgeting, verifying draw down and reimbursement requests meet regulations and requirements, compiling the information required for fiscal reporting and overseeing the audit process. Grants Accounting is expected to understand the regulations and requirements pertaining to their areas of responsibility.

Office of Research and Evaluation (ORE) will assess (or will provide guidance during the assessment) of programmatic activities related to programmatic goals. ORE may support the GPM or Principal in communicating program status to the grantor. ORE will need to understand the programmatic requirements of the grant in order to effectively execute any assessment.

Various other District staff will support GPMs or Principals in planning and accomplishing programmatic goals in accordance with grant requirements

Procedures

- *GP2400.1 Development of Program Compliance Monitoring Plans*

Forms

- *Program Compliance Monitoring Plan – Title I Schools*
- *Program Compliance Monitoring Plan – Non Title I Schools – Central Office*
- *Program Compliance Monitoring Plan- Supplemental Monitoring Title I Schoolwide Needs Assessment and Planning Addendum- Schools.*

Definitions

Contacts

- *Grant Compliance Office*
- *Office of Federal Programs*

Frequently Asked Questions

Related Information

- *Uniform Grant Guidance. 2 CFR Part 200*
- *Program Manager Core Competencies List*

History

Amended:

- Amended 6/3/2015 for references to the Uniform Grant Guidance and technical adjustments.
- Amended 6/30/2016 for inclusion of the Supplemental Monitoring tool and role of the Office of Federal Programs.

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