



Sub Recipient Monitoring
 DCF Tribal Consultation
 May 2018



WISCONSIN DEPARTMENT OF
 CHILDREN AND FAMILIES

Contractors vs. Subrecipients

Contractors	Subrecipients*
Provide goods and services within normal business operations	Determine who is eligible to receive what Federal assistance
Provide similar goods or services to many different purchasers	Have their performance measured relative to whether the objectives or a Federal program were met
Normally operates in a competitive environment	Have responsibility for programmatic decision making
Provide ancillary goods or services to the operation of the program	Are responsible for adherence to applicable Federal program requirements specified in the Federal award
Are not subject to compliance requirements of the Federal program as a result of the contract award, though similar requirements may apply for other reasons	Use the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of DCF

**where Subrecipient criteria are met, classification is subrecipient*

Overview: OMB Uniform Guidance (UG)

- **Governs use of federal funds**
 - *Effective 2015, first released 2012*
 - *First major revision/reform of OMB guidelines in almost 50 years*
 - *Consolidates eight OMB circulars into one set of guidance*
 - *Codified at 2 CFR Part 200 (45 CFR Part 75 for HHS)*
- **Fiscal & administrative requirements**
- **Plus, increased focus on performance**
 - *via sub-recipient fiscal/program performance monitoring requirements*
- **Non-compliance risks loss of federal funds**

DCF & UG Requirements: Subrecipient Performance Monitoring

- **Pre-award:**
 - *Ensure source of federal award & all requirements are included in award notice (Finance)*
 - *Assess subrecipient risk for noncompliance (Finance & Program)*
 - *Develop a performance monitoring plan aligned with risk level (Finance & Program)*
- **Post-award:**
 - *Monitor activities for compliance & achievement of performance goals (Program)*

Reference:

45 CFR Part 75 (Section 352) for HHS awards

2 CFR Part 200 (Sections 330-332) for other federal agency awards

***Subrecipient Performance Monitoring Requirements:
Program Responsibilities***

Practically speaking, to meet these requirements, programs must:

1. Specify program & fiscal performance metrics in subrecipient contract
 - *If federal awarding agency doesn't specify metrics, pass-through entity must do so*
 - *Pass-through entity may require additional metrics*

***Subrecipient Performance Monitoring Requirements:
Program Responsibilities, Cont.***

2. Develop & implement a written performance monitoring plan
 - *Plan must address both fiscal and program performance*
 - *Plan must be included in subrecipient contract*
3. Document monitoring activities & identified issues
4. Document any follow up activity in response to identified issues.

Uniform Grant Guidelines: Subrecipient Performance Monitoring Contract Compliance Checklist

	1	2	3	4	5	6	7	8
Contract Title								
Subrecipient Entity Name								
Contract Manager								
SIMON Contract Number								
CFDA Number								
Subaward identified & required information included	<input type="checkbox"/>							
Requirements for use of award in accordance with federal terms & conditions included	<input type="checkbox"/>							
Fiscal & performance metrics & report requirements included	<input type="checkbox"/>							
Monitoring plan included	<input type="checkbox"/>							
Monitoring plan includes plan for reviewing required reports	<input type="checkbox"/>							
Monitoring plan includes plan for follow up to ensure action taken on identified deficiencies	<input type="checkbox"/>							
Date Reviewed								

Components of a Performance Monitoring Plan

- Clear objectives
- Measurable performance metrics
- Monitoring activity
- Frequency
- Who conducts it
- Follow up communication

The plan's complexity depends on the complexity of the service, the value of the contract, and the risk to the agency of poor performance.


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Subrecipient Performance Monitoring Plan Template

Contract # & Agency Name:	
Performance Goal # _____: (specify fiscal or program)	
Objective	Specify
Performance Metric	Specify. Must be measurable.
Monitoring Activity	Specify activity to be conducted and how information is to be collected. List the type of monitoring mechanism/s to be used; could include required program and fiscal reports, site visit, etc.
Monitoring Content	List the required content of the activity; should relate directly to the performance measure being reviewed and include required data prescribed by the federal award, if applicable, and any additional requirements imposed by DCF (the pass-through entity).
Frequency	Specify how often this monitoring mechanism is to be used: annually, weekly, monthly, quarterly, etc.
Conducted by	Specify who reviews the program reports
Follow up Mechanism	Specify how monitoring results will be communicated to the subrecipient

Performance Monitoring Documentation: Activities Summary Template

Agency/Contract #	
Risk Assessment Date	Finance provides fiscal assessment annually; program staff provide program assessment annually/at time of contract renewal
Risk Assessment Results/ Classification	Finance provides annually; program staff provide results of non-fiscal assessment.
Monitoring Activity	Type of activity Ex: Program Report, desk review, etc.
Conducted by	Name of staff reviewing report
Date Conducted	Date the activity occurred
Results Documented (Yes/No)	Confirm that the results of the monitoring activity are documented.
Follow up Mechanism	Document how results are communicated to subrecipient For example, corrective action plan, letter of approval, etc.
Follow up Frequency	Document the frequency of the specified follow up monitoring, if indicated. For example, "subrecipient will be monitored monthly until..."
Follow up Documented	Confirm that follow up activity occurred, is documented (Yes/No), and location of documentation.

