



BROADBANDUSA

CONNECTING AMERICA'S COMMUNITIES

Broadband Technology Opportunities Program

FY11 BTOP Monitoring and Assessment Plan

June 29, 2011

Version 1.1

Prepared for:

National Telecommunications and Information Administration

**Broadband Technology Opportunities Program
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Table of Contents

1	Introduction.....	1
1.1	Plan Purpose	1
2	Overview of BTOP Monitoring Approach.....	2
2.1	Program Report Reviews.....	3
2.2	Desk Reviews	6
2.3	Site Visits	6
3	Monitoring and Assessment Activities	8
3.1	Establishing Initial Monitoring Levels.....	9
3.2	Annual Risk Assessment	9
3.3	Audits and Audit Findings	11
3.4	Standard Monitoring Activities	12
3.5	Intermediate Monitoring Activities.....	12
3.6	Advanced Monitoring Activities.....	13
3.7	Changes in Monitoring Level	15
4	Corrective Courses of Action.....	16
4.1	Performance Improvement Plans	16
4.2	Technical Assistance Plans (TAPs).....	16
4.3	Corrective Action Plans.....	16
4.4	Recipient Communications	17





1 Introduction

The requirements of the American Recovery and Reinvestment Act of 2009 (ARRA) demand an unprecedented level of accountability and oversight for federal programs including the Broadband Technology Opportunities Program (BTOP). As the awarding agency, it is important for the National Telecommunications and Information Administration (NTIA) to implement effective and rigorous programmatic monitoring and assessment activities that engage recipients, track programmatic and fiscal performance across all awards, ensure compliance with statutory and programmatic requirements, mitigate risks and issues pertaining to the recipients, and demonstrate the ability to be accountable in the administration and management of BTOP awards to protect taxpayer investments. It is also critical that programmatic monitoring and assessment activities are executed in close coordination with the appropriate Grants Offices—the National Oceanic and Atmospheric Administration (NOAA) and the National Institute of Standards and Technology (NIST)—because NTIA and the Grants Offices have specific complementary responsibilities with respect to grant administration and oversight.¹ The benefits and intended outcomes of effective grant monitoring include:

- The project complies with the terms and conditions of the award incorporated in the CD-450, including any special award conditions, amendments, and applicable laws and regulations;
- The project is implemented on a timely basis as outlined in the award;
- Adequate progress is being made toward achieving project goals, objectives, and planned outcomes;
- Reporting requirements are met on a timely basis and the information reported is accurate; and
- ARRA funds are expended as authorized and in a timely manner.

1.1 Plan Purpose

The Fiscal Year 2011 (FY11) BTOP Monitoring and Assessment Plan has the following primary objectives:

- Defines the programmatic and grant monitoring activities to be executed in FY11. The FY10 BTOP Monitoring plan is incorporated into this document by reference and serves as the basis for FY11 activities.
- Describes the criteria used to assess the level of monitoring associated with each project and further defines the specific assessment activities associated with each monitoring level. NTIA has established three levels of monitoring: standard, intermediate, and advanced.
- Focuses on activities required in FY11 based on NTIA's anticipated resource and budget availability. NTIA anticipates that the monitoring needs of the program will evolve and change over time, based on programmatic needs and recipient progress—and the findings of previous project monitoring assessments.

¹ The Monitoring Plan, monitoring levels, and frequency of site visits and other monitoring activities may change based upon available budget resources. NTIA is currently operating under a Continuing Resolution that expires on 4 March 2011.



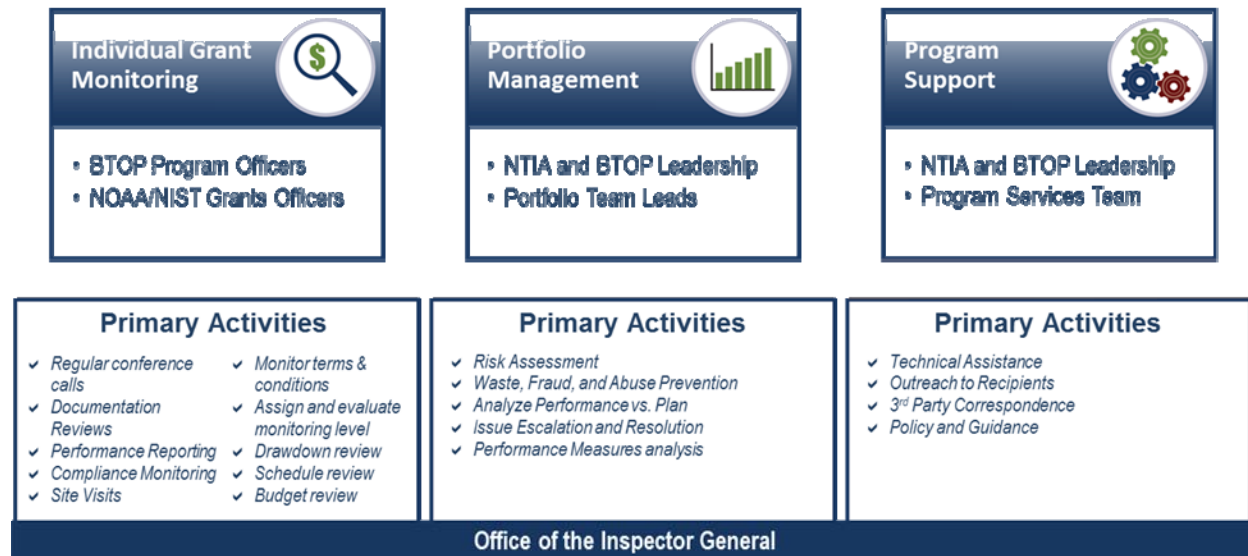


2 Overview of BTOP Monitoring Approach

Considering the depth and complexity of BTOP as a program, fiscal and staffing constraints, and the diverse nature of BTOP recipients and awards, it is critical to design a comprehensive monitoring approach that is effective, realistic and manageable for NTIA and the Grants Offices to implement. Based on this guiding principle, BTOP has aligned its monitoring efforts and personnel to emphasize the following key functions:

Monitoring Function	Description
Individual Grants Monitoring	BTOP Program Officers and contractor support staff are aligned with grants and recipients. They hold primary responsibility for regular engagement with recipients, reporting reviews, and the performance of monitoring activities such as desk reviews, site visits, and the drawdown of grant funds.
Portfolio Management	Other BTOP staff members, including portfolio Team Leads, perform higher-level evaluation of performance metrics and the variance between project performance and baseline plan. This function also supports the resolution of issues that arise during performance of an award, as well as review and documentation of "cross-cutting" issues which may affect multiple projects.
Program Support	Program Support offers an array of support activities to assist both the program and recipients address policy, legal, organizational, financial, and technical hurdles that arise during performance of BTOP awards. These activities include the review and publication of Fact Sheets and other guidance; investigation of program issues and grants best practices; interagency support and communications; and managing third-party inquiries.

The overriding goal of BTOP monitoring is to ensure that recipients are in compliance with the terms and conditions of their awards incorporated in their CD-450s; they are progressing toward successful and timely completion of their projects; and the program mitigates the potential for waste, fraud, and abuse. Monitoring also identifies needs and provides context for other activities (e.g., progress against key performance indicators, the provision of technical assistance, and so forth).





The BTOP monitoring function, supported by both Federal and contractor personnel, includes various monitoring activities—such as desk reviews, site visits, and program report reviews—which produce data about recipient performance and progress that will be used to inform and direct the provision of technical assistance and appropriate corrective action and enforcement measures as warranted. The Technical Assistance function, supported by both federal and contractor personnel, will be targeted at general issues facing all or a subset of recipients as well as issues specific to a given recipient who is facing particular performance challenges or setbacks. The same data will be useful in constructing a robust view of the BTOP portfolio, inclusive of accomplishments, key outcomes, and other information to be used by senior management to assess the overall progress and status of the BTOP grants. BTOP possesses an important program reporting function which is responsible for gathering critical data about recipient performance and progress for use by the program office, BTOP program leadership, and external stakeholders. These reports will also show the program's compliance with deadlines and requirements, such as ARRA reporting, SF-425 financial reporting, and BTOP quarterly and annual performance reporting. The close monitoring of these key reports by the respective Grants Officer (GO) and Federal Program Officer (FPO) is critical in assessing recipient compliance with award terms and conditions and OMB/DOC guidance on prevention of waste, fraud, and abuse.

Grant monitoring depends on the submission of timely and accurate performance and financial data through quarterly progress and financial reports. However, this data set will be supplemented with additional data gathered through other mechanisms to enrich the view of recipient performance and progress throughout the grant performance period, such as monitoring activities to further support the oversight of recipient activities. Through these activities, such as desk reviews and site visits, immediate project risks and challenges are identified and addressed to facilitate successful project completion. Such activities will also inform certain longer term courses of action for recipients to implement, in the case of recipient performance issues, based on the severity and nature of such issues. Additionally, the monitoring activities of two other organizations – the Grants Offices and the Office of Inspector General (OIG) – can provide additional insight into recipient performance through their reviews of submitted financial status reports, ARRA Reports, Amended Award Requests, and A-133 Audits and Program Specific Audits for For-Profit grantees. Presented in the sections below is the set of monitoring activities that the BTOP program office will utilize throughout the program lifecycle. Implementation timeframes and phases are noted.

2.1 Program Report Reviews

Recipients are required to submit several reports on progress and financial performance as outlined in the table below:

Report Type	Due Dates	Submission Method (FY 2010)	Data Submitted	FPO and Grants Office Responsibility
ARRA Report	<ul style="list-style-type: none"> 10 days after quarter close 	<ul style="list-style-type: none"> Form: ARRA Section 1512 Reporting Model Submit at FederalReporting.gov 	Financial, programmatic, and jobs-related information for previous quarter	<ul style="list-style-type: none"> Grants Officer: Primary owner of this function, responsible for timeliness and completeness review and corrective action, if applicable. FPO: Review of jobs information, subrecipients, vendors, and project activities, per agreements with NOAA and NIST Grants Offices, upon request.





Report Type	Due Dates	Submission Method (FY 2010)	Data Submitted	FPO and Grants Office Responsibility
Financial Report	<ul style="list-style-type: none"> 30 days after quarter close Within 90 days after award closeout 	<ul style="list-style-type: none"> Form: SF-425 FFR Submit via GrantsOnline for Infrastructure/CCI. Submit via PAM for PCC and SBA. 	Performance on key financial indicators.	<ul style="list-style-type: none"> Grants Officer: Primary owner of this function, responsible for timeliness and completeness review and corrective action, if applicable. FPO: Assists Grants Officer, per agreements with NOAA and NIST Grants Offices
Performance Progress Report (Quarterly and Annual)	<ul style="list-style-type: none"> 30 days after quarter close for quarterly By Jan 30th of each calendar year for annual 	<ul style="list-style-type: none"> Form: BTOP PPR Template All submit in PAM. 	Performance on key programmatic indicators and budget (federal and matching shares)	<ul style="list-style-type: none"> FPO: Responsible for timeliness, completeness, and content review for accuracy of information. Follow up with recipients as needed to obtain report corrections review and corrective action, if applicable Grants Officer: Supports FPO upon request.
Baseline Data Report	<ul style="list-style-type: none"> 30 days after quarter close of first reporting quarter 	<ul style="list-style-type: none"> Form: Baseline Data Report Template All submit in PAM 	Updates to key information provided in application regarding timelines and indicators of project success.	<ul style="list-style-type: none"> FPO: Responsible for timeliness, completeness, and content review for accuracy of information. Follow up with recipients as needed to obtain report corrections Grants Officer: Supports FPO upon request.





Report Type	Due Dates	Submission Method (FY 2010)	Data Submitted	FPO and Grants Office Responsibility
Mitigated FONSI ²	Issued by NTIA	Internal Memo: Mitigated FONSI		<ul style="list-style-type: none"> ■ FPO and Environmental Team: Responsible for working collaboratively to ensure that the requirements outlined in mitigated FONSI are included in desk reviews and monitored during award period.

The Grants Office and the BTOP FPOs each have responsibility with respect to the monitoring activities associated with recipient reporting.

- The Grants Office has responsibility for tracking recipient registration on FederalReporting.gov and for reviewing recipient ARRA reports for timely and complete submission. Upon request, BTOP FPOs may support the Grants Officer in reminding recipients to register on FederalReporting.gov and submit ARRA reports. Per BTOP's agreements with the NOAA and NIST grants officers, BTOP FPOs may also support the Grants Officer in the agency's data quality review each quarter.
- The Grants Office has responsibility for collecting and reviewing recipient financial reports, SF-425, for timely and complete submission. Upon request, BTOP FPOs may support the Grants Office in reminding recipients to submit reports. BTOP FPOs may review the content of recipient financial reports to assess overall recipient compliance and performance.
- The BTOP FPOs have responsibility for tracking receipt and completeness of recipient BTOP quarterly and annual performance progress reports, as well as monitoring the information contained in the reports. The Grants Officer stores the reports in the recipient's official award file, but defers to the FPO for management and review of performance progress reports. FPOs will review the content of recipient performance progress reports to assess overall recipient compliance and performance. BTOP FPOs will advise GOs of any deficiencies and, if necessary, recommend corrective action.

² If a recipient received an environmental Special Award Condition (SAC) to develop an environmental assessment under the National Environmental Policy Act (NEPA) or to conduct any consultation or permitting activities with one or more regulatory agencies, NTIA's environmental staff will monitor recipient progress towards meeting that SAC during the standard 6-month timeframe provided and in parallel with the processes described in the following sections. NTIA's environmental staff will coordinate with the FPO and GO and will provide technical assistance to the recipients, as necessary, to assist in clearing any environmental SACs. Once the environmental SAC is cleared and NTIA issues a Finding of No Significant Impact (FONSI), NTIA will not conduct any project environmental monitoring. To the extent that monitoring is required by another federal agency or state agency, then the applicable agency will be responsible for the monitoring of his or her specific issues. The only exception to this is when NTIA issues a mitigated FONSI as a result of the review of the recipient's environmental assessment. In a mitigated FONSI, changes to the proposed action or mitigation measures necessary to reduce otherwise significant impacts (or simply reduce adverse impacts) are documented as required for implementation. NTIA will review elements of the mitigated FONSI as a part of the monitoring activities outlined below. The need to monitor activities under the mitigated FONSI for those affected recipients will be noted and included in the various monitoring checklists and templates created to guide the execution of these activities.





Program report review processes have been developed to guide the reviews to be conducted by FPOs. FPOs have been trained on these processes which have been included in the FPO Post Award Handbook. In addition, BTOP has developed checklists and other job aids, offering FPOs portfolio-specific guidance when evaluating reports. These job aids undergo periodic reevaluation, to incorporate FPO feedback and improve quality.

2.2 Desk Reviews

A desk review is a monitoring activity conducted by an FPO to develop a comprehensive understanding of recipient progress and performance through a review of information provided by the recipient to substantiate its progress; demonstrate compliance with key mandates, DOC Terms and Conditions, ARRA Award Terms, Special Award Conditions, or milestones; and show achievement of reported outcomes or other measures. The FPO and contractor support staff will interact with the recipient via phone and/or email to obtain answers to specific questions identified through the desk reviews. There are three types of desk reviews to be implemented for BTOP:

- **Initial Desk Review.** Utilizing any performance and financial status reports submitted by recipients plus other data available to the program office, including baseline reports and draw downs made to date, the FPO completes an initial desk review evaluation form summarizing the key data. The FPO then conducts a conference call with the recipient to discuss status of recipient progress on special award conditions, reporting requirements, grants management practices, financial capabilities, and procurement procedures. The Initial Desk Review will conclude with the FPO documenting the desk review conclusions, including a recommended monitoring level and any next steps or corrective actions.
- **Periodic Desk Review.** These desk reviews utilize the quarterly and annual performance and financial status reports submitted by recipients plus any other data available to the program office, including the conference calls and draw downs made to date. Periodic Desk Reviews are completed in accordance with the monitoring levels and are an ongoing process, coinciding with the schedule of various reports identified in Section 2.1 of this document. Depending on the specific conclusions, changes to the assigned monitoring level, Performance Improvement Plans (PIPs), Technical Assistance Plans (TAPs), or Corrective Action Plans (CAPs) may be recommended. Identified issues that cannot be resolved through a phone interview may cause a recommendation of the next type of desk review – an Advanced Desk Review.
- **Advanced Desk Review.** This type of desk review is designed for detailed review of a particular issue or topic. Advanced Desk Reviews may be conducted as a follow-on to Periodic Desk Reviews to specifically address and collect additional information about identified issues or deficiencies. In addition to the data available during the Initial Desk Review or a Periodic Desk Review, FPOs will ask recipients to provide additional documentation or information to explain the full nature of identified issues or deficiencies. This information, typically provided via email by the recipient to the FPO, will be fully reviewed by the FPO. The Advanced Desk Review will conclude with the FPO documenting the analysis completed, conclusions drawn, and any next steps or corrective actions that are recommended. These corrective actions may take the form of a PIP, TAP, or CAP, depending on the specific findings.

It is important to note that the checklists and guidelines for desk reviews can be modified prior to a cycle of reviews being completed to address emerging and evolving issues facing recipients.

2.3 Site Visits

By visiting the actual project site, the FPO may evaluate the current status of a project as well as the recipient's ability to meet its goals and to adhere to grant requirements. A benefit of this review is that potential areas of concern can be corrected immediately on-site or through the development of a technical assistance plan. Two types of site visits will be conducted by program office staff and contractor support, in coordination with representatives from the Grants Offices. Grants Office representatives may join the BTOP FPOs on the site visits or recommend specific review items to be included in the visit.

- **Site Visits.** These visits will typically last 1-2 days and will be guided by a standardized agenda and checklist of review items. These visits will provide FPOs and contractor support staff with the opportunity to capture first-hand observations of recipient performance along multiple dimensions; for instance, from administrative capacity to the inspection of physical





infrastructure funded with grant funds. Customized agendas and performance data to be validated, confirmed, discussed, and/or observed will be identified in advance and communicated to the recipient so it can be fully prepared for the visit.

- **Advanced Site Visits.** These visits will typically last 2-3 days and will be in direct response to serious issues or concerns noted by the program staff in consecutive program report reviews or in response to another performance data point that gives rise to a programmatic concern. Advanced Site Visits will primarily be used when performance is trending in a negative direction or when the program office staff has significant concerns over the validity of performance data reported by recipients on their quarterly or annual reports. Customized agendas and performance data to be validated, confirmed, discussed, and/or observed will be identified in advance and communicated to the recipient so it can be fully prepared for the visit.

The recipient will be notified electronically and in writing in advance of either type of site visit being scheduled. A pre-review conference call alerts the recipient to the reasons for the site visit, what will be reviewed, required stakeholders, and the dates and times of the review. Sufficient notice will be given to allow recipients time to prepare and to make available for inspection the files or documents requested by the FPO.

- During the site visit, the program office staff will meet with key leaders and stakeholders from the recipient organization and key subrecipients assigned to the project, as appropriate. Evidence of project performance and other supplemental documentation will be reviewed and observed during the visit. At the conclusion of the site visit, the program office staff will develop a draft Site Visit Report that documents the findings and conclusions from the visit. Where site visits identify or confirm significant performance problems, the Program Office may specify corrective actions to be taken by the recipient based on observations and conclusions drawn from the site visit. These corrective actions may take the form of a PIP, TAP, CAP, or other action, depending on the specific findings. The Program Office may also adjust monitoring levels based on a site visit.

It is important to note that the checklists and guidelines for site visits can be modified prior to a cycle of reviews being completed to address emerging and evolving issues facing recipients.



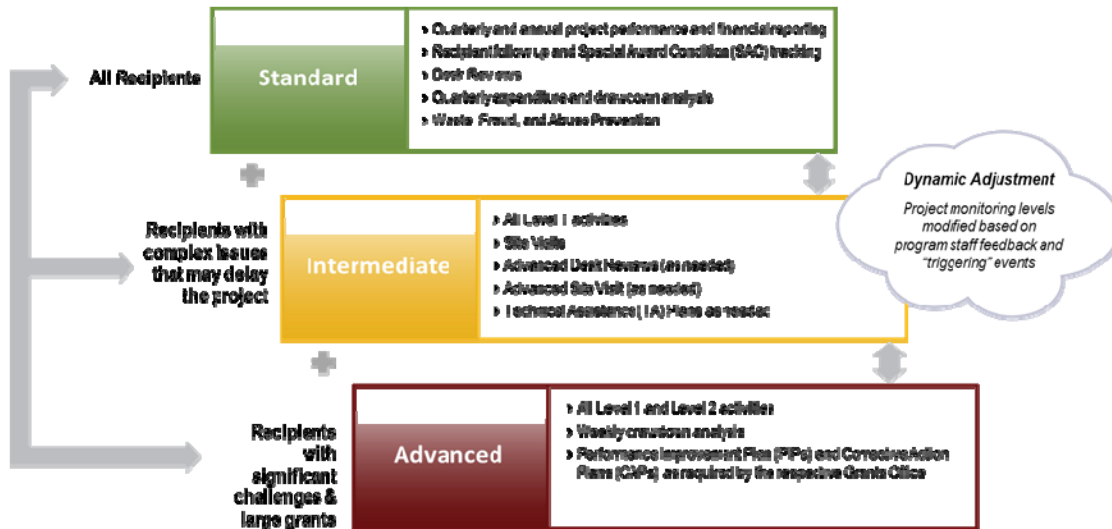


3 Monitoring and Assessment Activities

The BTOP team has developed the following guiding principles, while developing this FY11 BTOP Monitoring and Assessment Plan:

Guiding Principle	Description
Simplicity	The plan must be simple, easy to execute, explain, and report
Objectivity and Consistency	Monitoring activities should be designed to maximize objectivity and implement consistent monitoring across projects
Actionable	The approach and outputs should directly support decision making and monitoring actions
Realism	The plan must allocate program staff resources (specifically, FPO and contractor support) and activities based on available resources
Best Practices	BTOP will leverage the Department of Commerce's wealth of experience in monitoring grants and overseeing regulations

As depicted in the graphic below, the Monitoring and Assessment Plan is designed to apply a core set of monitoring activities to each grant. Based on identified issues and risks, additional monitoring activities will be performed as appropriate.³ This plan is designed to make the most efficient use of NTIA's available resources, while ensuring a standard and appropriate minimum level of monitoring for each grant.



³ Please note that this figure offers general guidelines only. The assignment of a monitoring level does not preclude the use of an appropriate monitoring activity (e.g., Performance Improvement Plans for projects with Standard or Intermediate monitoring levels).





3.1 Establishing Initial Monitoring Levels

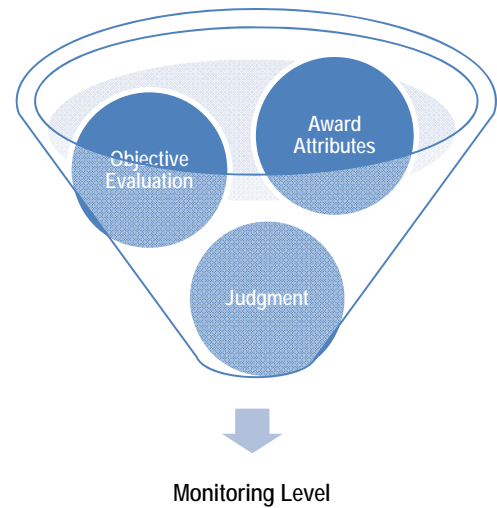
BTOP Program Staff have established monitoring levels for all BTOP grants projects based on the following criteria:

Criteria	Description
Grant Award and Drawdown Amount	The award amount and draw downs of each grant is a factor in the level of monitoring. CCI and 700MHz Public Safety grant awards exceeding \$80M, as well as grants exceeding \$10M in the PCC and SBA portfolios, will be subject to higher levels of monitoring.
Grants Office Reimbursement-Only Designation	During and after the award process, the Grants Office identified certain recipients as Reimbursement Only awardees. Grants awarded to such designees will initially be monitored at a higher level.
Initial Desk Review Findings/Unresolved Issues	Initial Desk Reviews evaluate a recipient's knowledge and capability to manage its grant and comply with various requirements, such as subrecipient oversight, grant reporting, and financial management. Certain recipients also have unresolved issues that initially require a higher level of scrutiny of the award.
FPO and Team Lead Judgment	The professional judgment of Federal Program Officers and Team Leads, based on grant stand-up activities and their regular interaction with recipients, will also be used to identify and adjust the required level of grant monitoring..

3.2 Annual Risk Assessment

As outlined in the FY10 BTOP Monitoring Plan, each grant will be evaluated on an annual basis to review potential risks affecting the recipient and the project. Risk is defined as anything that prevents a recipient from achieving the project's intended objectives and goals.

In FY11, an initial annual risk assessment will be conducted following the development of the program's Risk Assessment Tool. Results of this risk assessment will be synchronized with the initial monitoring level assigned to each project during Initial Desk Reviews, to determine if a change in monitoring level is required. Going forward, each project will be reevaluated at the end of each performance year, as described in the FY10 BTOP Monitoring Plan.



As demonstrated in the graphic in this section, the Risk Assessment and Monitoring tool will combine three elements to calculate a projected monitoring level:

- **Award Attributes.** These are evaluation criteria that should not change during performance of the award, without a modification to the grant requiring both Program Office and Grants Office approval.





Award Attribute	Description
Award Amount	The size of the grant award.
Number of Subrecipients	Total number of subrecipients proposed to participate in completion of a project. It is anticipated that complexity and risk increase with the number of parties involved.
Technical Project Complexity	Identifies the technical complexity and potential technical challenges associated with a grant award.
Three-Year Projects	Identifies projects with baselines that have significant construction or deployment in the 11th and 12th quarters, nearest to the period of performance deadline.
Type of Recipient	Identifies the recipients as a state government, local government, nonprofit, new consortium, or for-profit company.

- Objective Evaluation.** Data associated with several project categories provide an indicator of project health. The Risk Assessment Tool utilizes the variance between performance data submitted by recipients in Quarterly and Annual PPRs with their approved Baseline to evaluate performance in several important categories. The variance between a recipients plan and actual results provide an indicator of the health and likelihood of success for a given project; these are important indicators of a projects overall risk.

Objective Criteria	Description
Project Management and Execution	The recipient's ability to successfully execute the project based on measures such as experience, adherence to baseline milestones/indicators, previous audit findings, etc.
Financial Management	The recipient's ability to appropriately manage project finances based on measures such as experience, adherence to spend plan, financial SACs, previous audit findings, FFR submission/accuracy, etc.
Grants Management	The recipient's ability to manage a federal grant based on measures such as previous experience, PPR submission/accuracy, ARRA submission, previous audit findings, etc.
Match Acquisition	The recipient's ability to appropriately contribute its match based on measures such as in-kind and cash contributions, timing of contributions, and security interest issues, etc.
Technical Expertise	The recipient's technical knowledge and expertise based on measures such as network design/construction experience, network operation experience, technical issues during construction (for CCI and Public Safety awards) and curriculum development, training experience, and PCC operations (for SBA and PCC awards).

- Professional Judgment.** Using the same categories as the Objective Criteria, FPOs will complete a subjective assessment of each category, using their professional judgment, interactions with the recipient, and knowledge of the project. FPOs will identify whether the risk in a particular category is High, Medium, or Low, and these professional assessments will be added to the project attributes and based on these inputs, the Risk Assessment and Monitoring Tool will provide insight to the monitoring level, to be evaluated by the FPO and Team Lead. With Team Lead approval, the monitoring level can be overridden (higher or lower) to account for any deficiencies or exceptions which the Risk Assessment Tool cannot account for. This is designed to give program staff the flexibility to exercise their professional judgment when evaluating risk.





Objective Criteria	Description
High Risk	<ul style="list-style-type: none"> ■ If the recipient faces challenges in the area, are you concerned that it may have difficulty overcoming those challenges, even with assistance from NTIA? ■ Does the recipient often provide inaccurate responses (or doesn't know answers) when asked about the area?
Moderate Risk	<ul style="list-style-type: none"> ■ If the recipient faces challenges in the area, are you confident that it can overcome those challenges with assistance from NTIA? ■ Does the recipient generally provide accurate answers (with a few minor exceptions) when asked about the particular area?
Low Risk	<ul style="list-style-type: none"> ■ Does the recipient face few challenges in the area? ■ If the recipient faces some challenges in the area, are you confident that it will be able to overcome them with little to no help from NTIA? ■ Does the recipient provide confident, accurate answers when asked about the particular area?

3.3 Audits and Audit Findings

Audit reports may provide additional information to be used in monitoring. The OIG reviews both the A-133 organizational-wide audits and the Program-Specific audits for for-profit entities and provides any findings to the recipient and the Grants Office.⁴ The Grants Office holds primary responsibility for drafting the audit resolution. The Grants Office also maintains the official audit file.

FPOs, in conjunction with the Compliance office, may support the Grants Office by providing feedback on any audit findings, including information with respect to corrective action taken by the recipient. After input from the recipient, the Grants Office provides the Audit Resolution Proposal (ARP) to the OIG for review and concurrence. Upon receipt of the OIG's concurrence, the Grants Office prepares an Audit Resolution Determination letter (ADL) to the recipient. The ADL informs the recipient of any disallowed costs, evidence to establish corrective action, and informs the recipient of its limited right to appeal a disallowance. FPOs may work with the Grants Office, as requested, to ensure that any remaining findings are monitored and corrected through the implementation of a corrective action plan. As a result, audit findings and associated plans for resolution may act as a trigger to reevaluate the monitoring level assigned to a particular award.

⁴ For Single Audits under A-133, recipients submit copies of the audit reports to the Federal Audit Clearing House at <http://harvester.census.gov/sac/> within 9 months of the end of the recipient's fiscal year. Program-Specific Audits of For-Profit entities are due every two years, beginning with the first grant year. Within 90 days of the end of the recipient's grant year, recipients submit copies of the audit reports to the OIG by mail and the Grants Office through the PAM system.





3.4 Standard Monitoring Activities

Following the assignment of a project to Standard monitoring, BTOP intends to perform the following monitoring activities. Please note that these are targets and specific activities may be adjusted by BTOP portfolio Team Leads during the performance of grant monitoring.

Activity	Description
Conference Calls	FPOs will conduct a conference call with each recipient, on at least a monthly basis (and more frequently as needed) to discuss issues and review project status.
Initial Desk Reviews	FPOs will complete an initial desk review with each recipient by the end of January 2011.
Periodic Desk Reviews	FPOs will perform detailed reviews of the performance reports submitted by recipients during each year of performance. FPOs will also capture comments regarding their approval of each report, in the program file: <ul style="list-style-type: none"> ■ Project Baselines ■ Quarterly Performance Progress Reports ■ Annual Performance Progress Reports In addition, FPOs will review other data and reports available to them. Please note that no specific documentation will be captured for these reviews, unless FPOs identify an issue which required further investigation or a corrective plan: <ul style="list-style-type: none"> ■ Weekly Drawdown Report ■ Quarterly ARRA Report ■ Quarterly Federal Financial Report
Advanced Desk Reviews	Advanced Desk Reviews are not anticipated for grants receiving Standard Monitoring.
Site Visits	BTOP will set as a target to conduct a site visit for every grant receiving Standard Monitoring over the course of the award period.
Advanced Site Visits	Advanced Site Visits are not anticipated for grants receiving Standard Monitoring.
Risk Assessment	Grants monitored at the Standard level will be subject to a Risk Assessment on an annual basis.

3.5 Intermediate Monitoring Activities

Following the assignment of a project to Intermediate monitoring, BTOP intends to perform the following monitoring activities. Please note that these are targets and specific activities may be adjusted by BTOP portfolio Team Leads during the performance of grant monitoring.





Activity	Description
Conference Calls	FPOs will conduct a conference call with each recipient, on at least a bi-weekly basis (and more frequently as needed) to discuss issues and review project status.
Initial Desk Reviews	FPOs will complete an initial desk review with each recipient by the end of January 2011.
Periodic Desk Reviews	<p>FPOs will perform detailed reviews of the performance reports submitted by recipients during each year of performance. FPOs will also capture comments regarding their approval of each report, in the program file:</p> <ul style="list-style-type: none"> ■ Project Baselines ■ Quarterly Performance Progress Reports ■ Annual Performance Progress Reports <p>In addition, FPOs will review other data and reports available to them. Please note that no specific documentation will be captured for these reviews, unless FPOs identify an issue which required further investigation or a corrective plan:</p> <ul style="list-style-type: none"> ■ Weekly Drawdown Report ■ Quarterly ARRA Report ■ Quarterly Federal Financial Report
Advanced Desk Reviews	FPOs will conduct Advanced Desk Reviews for high-risk project elements of Intermediate grants on an as-needed basis and schedule to be determined by the FPO and Team Lead for each Intermediate project. Advanced Desk Reviews may be triggered by the identification of non-compliance with award terms and conditions; documentation of substantial variance between project performance and plan; allegations of waste, fraud, or abuse; or other events warranting investigation through an Advanced Desk Review,.
Site Visits	Grants set at intermediate monitoring level will be visited once at a minimum over the course of the grant award.
Advanced Site Visits	Advanced Site Visits are anticipated for Intermediate projects to diagnose specific project issues or provide technical assistance. Advanced Site Visits will be scheduled on an as-needed basis to be determined by the FPO and Team Lead for each Intermediate project. Advanced Site Visits may be triggered by the identification of significant issues or technical assistance needs; documentation of substantial variance between project performance and plan; allegations of waste, fraud, or abuse; or other events warranting investigation through an Advanced Site Visit, as determined by the professional judgment of program staff.
Risk Assessment	Intermediate grants will be subject to a Risk Assessment on an annual basis

3.6 Advanced Monitoring Activities

Following the assignment of a project to Advanced monitoring, BTOP intends to perform the following monitoring activities. Please note that these are targets and specific activities may be adjusted by BTOP portfolio Team Leads during the performance of grant monitoring.





Activity	Description
Conference Calls	FPOs will conduct weekly conference calls to review projects with grant amounts in excess of \$80M. FPOs will conduct a conference call with other projects requiring advanced monitoring on a biweekly basis (and more frequently as needed) to discuss issues and review project status.
Initial Desk Reviews	FPOs will complete an initial desk review with each recipient by the end of January 2011.
Periodic Desk Reviews	<p>FPOs will perform detailed reviews of the performance reports submitted by recipients during each year of performance. FPOs will also capture comments regarding their approval of each report, in the program file:</p> <ul style="list-style-type: none"> ■ Project Baselines ■ Quarterly Performance Progress Reports ■ Annual Performance Progress Reports <p>In addition, FPOs will review other data and reports available to them. Please note that no specific documentation will be captured for these reviews, unless FPOs identify an issue which required further investigation or a corrective plan:</p> <ul style="list-style-type: none"> ■ Weekly Drawdown Report ■ Quarterly ARRA Report ■ Quarterly Federal Financial Report
Advanced Desk Reviews	FPOs will conduct Advanced Desk Reviews for high-risk project elements of Advanced grants on an as-needed basis and schedule to be determined by the FPO and Team Lead for each Advanced project. Advanced Desk Reviews may be triggered by the identification of non-compliance with award terms and conditions; documentation of substantial variance between project performance and plan; allegations of waste, fraud, or abuse; or other events warranting investigation through an Advanced Desk Review,.
Site Visits	Advanced grants will be subject to a minimum of two site visits during the award period. Site visits will be conducted by FPOs, contractor support staff, or Grants Office representatives.
Advanced Site Visits	Advanced Site Visits are anticipated for Advanced projects to diagnose specific project issues or provide technical assistance. Advanced Site Visits will be scheduled on an as-needed basis to be determined by the FPO and Team Lead for each Advanced project. Advanced Site Visits may be triggered by the identification of significant issues or technical assistance needs; documentation of substantial variance between project performance and plan; allegations of waste, fraud, or abuse; or other events warranting investigation through an Advanced Site Visit, as determined by the professional judgment of program staff.
Risk Assessment	Advanced grants will be subject to a Risk Assessment twice per year





3.7 Changes in Monitoring Level

The result of any monitoring activity described in this section could result in a change upward or downward to the monitoring level assigned to any grant. The following is a list of possible events that could trigger a recommendation for an upward adjustment of a project's monitoring status:

- Reports of fraud, waste, or abuse
- Significant change in project activity
- Excessive or significantly minimal drawdown of federal funds
- Uncertainty over ability to meet matching requirements
- Consistent delinquency on submission of and completeness of reports (including Baselines, Quarterly and Annual Performance Progress Reports, ARRA Reports, Federal Financial Reports, and required audits)
- Violation of Federal, State, ARRA Laws (including the Davis Bacon Act)
- Violation of Financial Compliance Requirements
- Violation of Performance Compliance Requirements
- Violation of Award Terms or Special Award Conditions
- Audit Findings
- Management or key personnel changes that could impact performance

Monitoring activity results can also lead to a monitoring level decrease (e.g. Intermediate to Standard or Advanced to Intermediate) if the recipient has demonstrated positive outcomes and a high level of performance. FPOs will work with Program Office leadership and the Grants Office to adjust monitoring levels as appropriate.





4 Corrective Courses of Action

When performance issues that require formal documentation and correction are noted as a result of any of the monitoring activities outlined in this document, program staff may, with appropriate Grants Office involvement, specify that certain corrective courses of action be undertaken by the recipients to address the noted issues.

Generally, BTOP utilizes the following process to identify, prepare, and resolve a corrective plan:



Depending on the characteristics of a particular issue and recipient, several options are available for achieving performance improvement. The particular plan to be utilized should be based on the nature and severity of the identified performance issues, as described below.

4.1 Performance Improvement Plans

A Performance Improvement Plan (PIP) is a method used by BTOP to address recipient performance and administrative issues. It is a tool used to document a required recipient action, for which the recipient is required to acknowledge and affirm.

PIPs are typically recommended for performance issues of a non-technical nature. Examples of issues prompting a PIP include the need for timely report submission after missing two quarterly reporting deadlines, submitting corrections to erroneous performance data, corrections to an Award Action Request, or updates to the plan to achieve various project milestones. Each PIP will specify exactly how the recipient can cure the identified performance issue and the required resolution date.

4.2 Technical Assistance Plans (TAPs)

A Technical Assistance Plan (TAP) is a collaborative tool used by the Program Office and recipient (if requested by recipient) to correct an identified program and/or administrative area of noncompliance or concern.

The FPO may recommend specific TAPs for a recipient if the recipient has performance issues and requires project-specific support or technical expertise. The FPO should coordinate with the recipient and appropriate technical assistance providers to ensure that assistance is provided in a timely and useful fashion. A TAP can be used in conjunction with a PIP and can be most effective when performance of a recipient begins to trend in a negative direction. The length of TAPs may vary depending on the content of individual TAPs.

4.3 Corrective Action Plans

A CAP is Grants Office method to address and officially document significant non-compliance or chronic, unresolved performance issues.

If BTOP identifies significant compliance or chronic, unresolved performance issues, program staff may recommend a CAP be developed, in coordination with the Grants Officer and BTOP Program Office. CAPs will specify how non-resolution of identified performance issues will be escalated to the Grants Office for further remedy. CAPs may be used in conjunction with a TAP and a PIP.





4.4 Recipient Communications

All corrective plans will be communicated in writing to recipients. A standard template modified for each type of plan will be utilized for consistency and uniformity across the portfolio. All plans will be reviewed by BTOP portfolio team leaders, and may be reviewed by the relevant Grants Office prior to release to the recipients. Program staff will track the completion of all remedial courses of action and will proactively communicate to recipients that status and any changes to the remedial courses of action. All associated documentation for remedial courses of action will be stored in the recipient's grant file.

