



- Bureau Order  
 Special Order

Order No.: **GTSB 20-01**

- Procedure  
 Plan  
 Rule

## Iowa Department of Public Safety Governor's Traffic Safety Bureau

**TITLE/SUBJECT: Administrative and Performance Monitoring for Law Enforcement Grants**

**IDENTIFIER: 47-02.03**

**TO: All GTSB Personnel**

**CC:**

**RELATED DIRECTIVES/FORMS: U.S. DOT Common Rule – Title 49 CFR Part 2, Sub. A, Chapter II, Part 200, Sub. D 200.328**

**APPLICABLE CALEA STANDARD(S):**

**EFFECTIVE DATE: 2-26-2020**

**REVISION #: 9**

**INSTRUCTIONS:**

**APPROVED BY:**

*Patrick J. Hoye*

**Patrick J. Hoye, Bureau Chief**

**DATE:**

**February 26, 2020**

### I. Purpose

**A.** The purpose of monitoring is to:

1. Maintain control of a project
2. Detect problems
3. Identify changes or training needed
4. Provide data for planning and evaluation
5. Ensure grantees are in compliance with applicable federal requirements
6. Ensure performance goals are being achieved
7. Create opportunities for the GTSB to provide technical assistance when needed.
8. Protect against fraud and misuse of GTSB funds.

### II. Policy

It is the policy of the Governor's Traffic Safety Bureau to ensure that GTSB contract grantees adhere to federal and state regulations that govern the Grant projects.

### III. Definitions

**A. Program Administrator (PA)** – The GTSB staff member assigned to manage specific contracts with grantees.

**B. Grantee** - For the purpose of this policy a *grantee* means the government to which a contract is awarded from the Governor's Traffic Safety Bureau and which is accountable for the use of the funds provided.

**C. Funding Level** – The total dollar amount of a contract granted to a grantee.

1. Level 1 = \$1 – 24,999

2. Level 2 = \$25,000 – 99,999
3. Level 3 = \$100,000 ^

**D. Monitoring Types**

1. **Desktop** – A review of reports, claims and other submissions by a grantee on a prescribed GTSB form. Desktop monitoring does not preclude the Program Administrator from conducting On-Site visits.
2. **On-Site** – A GTSB Program Administrator conducts an on-site visit at the grantee’s facility.

**IV. Procedure**

**A. Level 1 = Funding \$1 – 24,999 (Does not include sTEP projects)**

<b>RESPONSIBLE PARTY</b>	<b>REQUIRED ACTION</b>	<b>NOTE/COMMENT</b>
Program Administrator	1. Once, between October 1 and September 30 of each year, the PA responsible for the Grant shall conduct an on-site monitoring session utilizing approved GTSB monitoring form(s).	Requires 1 on-site per year.
	2. Discuss deficient areas with the grantee representative, if any are identified that indicate a consistent pattern of non-compliance over a 3-month period. Note outcome on approved GTSB monitoring form(s).	
	3. Discuss non-compliant areas with grantee immediately or within 7 calendar days from date of on-site visit and identify remedies that will be implemented to correct the non-compliant areas. Utilize approved GTSB monitoring form(s) to detail corrective actions to be taken by grantee.	
	4. Furnish a hard or electronic copy of approved GTSB monitoring form(s) to the grantee.	
	5. If, during the on-site monitoring session, discrepancies are discovered that may be considered fraud or internal misuse of funds, the PA will copy all relevant documents and provide them to the BC.	
	6. Forward all completed original monitoring forms to Monitoring File Manager	
Grantee	7. Within 21 calendar days from the onsite visit sign and return approved GTSB monitoring form(s) verifying corrective actions identified have been implemented and the non-compliant area(s) is(are) in compliance.	

Program Administrator	8. If grantee does not comply with corrective actions by the required date, advise the grantee agency head that the contract is out of compliance and future reimbursements may be withheld if corrective measures are not implemented and verified.	
Monitoring File Manager	9. If grantee does not comply with corrective actions, discuss with BC and PA and prepare a memorandum of intent to cancel contract and send by certified mail to grantee agency head.	
	10. If grantee does not comply with corrective actions, discuss with BC and PA and prepare a memorandum canceling the contract and send by certified mail to grantee agency head.	
	11. Update monitoring file as needed through life of grant cycle.	
	12. Provide copies of all monitoring forms to Grant Administrator.	
Grant Administrator	13. Note receipt of monitoring forms in tracking report.	
	14. File monitoring forms in master grant file.	
	15. When necessary, provide each PA with a monthly Tracking Report Summary, <a href="#">GTSB Form 64</a> .	
Bureau Chief	16. If a PA turns over documents that indicate a possible fraud or misuse of GTSB funds and the BC concurs that there is a fraud/misuse possibility, the BC will provide the relevant documentation to the Division of Criminal Investigation for further investigation.	
	17. If, after an investigation, it is determined that the grantee did commit fraud or misuse of GTSB funds, the BC will notify the grantee of the finding, inform them their GTSB contract is cancelled, and consult with the County Attorney's Office, the Attorney General's Office or other appropriate entity for the potential recovery of funds or other suitable action.	

## V. Procedure

### A. Level 2 = \$25,000 – 99,999

RESPONSIBLE PARTY	REQUIRED ACTION	NOTE/COMMENT
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Program Administrator	1. Once, between October 1 and March 31 and once between April 1 and September 30 of each year, the PA responsible for the Grant shall conduct an on-site monitoring session utilizing approved GTSB monitoring form(s).	Requires 2 on-sites per year.
	2. Discuss deficient areas with the grantee representative, if any are identified that indicate a consistent pattern of non-compliance over a 3-month period. Note outcome on approved GTSB monitoring form(s).	
	3. Discuss non-compliant areas with grantee immediately or within 7 calendar days from date of on-site visit and identify remedies that will be implemented to correct the non-compliant areas. Utilize approved GTSB monitoring form(s) to detail corrective actions to be taken by grantee.	
	4. Furnish a hard or electronic copy of approved GTSB monitoring form(s) to the grantee.	
	5. If, during the on-site monitoring session, discrepancies are discovered that may be considered fraud or internal misuse of funds, the PA will copy all relevant documents and turn them over to the BC.	
	6. Forward all completed original monitoring forms to Monitoring File Manager	
Grantee	7. Within 21 calendar days from the onsite visit sign and return approved GTSB monitoring form(s) verifying corrective actions identified have been implemented and the non-compliant area(s) is(are) in compliance.	
Program Administrator	8. If grantee does not comply with corrective actions by the required date, advise the grantee agency head that the contract is out of compliance and future reimbursements may be withheld if corrective measures are not implemented and verified.	
Monitoring File Manager	9. If grantee does not comply with corrective actions, discuss with BC and PA and prepare a memorandum of intent to cancel the contract and send by certified mail to grantee agency head.	

	10. If grantee does not comply with corrective actions, discuss with BC and PA and prepare a memorandum canceling the contract and send by certified mail to grantee agency head.	
	11. Update monitoring file as needed through life of grant cycle.	
	12. Provide copies of all monitoring forms to Grant Administrator.	
Grant Administrator	13. Note receipt of monitoring forms in tracking report.	
	14. File monitoring forms in master grant file.	
	15. When necessary, provide each PA with a monthly Tracking Report Summary, <a href="#">GTSB Form 64</a> .	
Bureau Chief	16. If a PA turns over documents that indicate a possible fraud or misuse of GTSB funds and the BC concurs that there is a fraud/misuse possibility, the BC will provide the relevant documentation to the Division of Criminal Investigation for further investigation.	
	17. If, after an investigation, it is determined that the grantee did commit fraud or misuse of GTSB funds, the BC will notify the grantee of the finding, inform them their GTSB contract is cancelled, and consult with the County Attorney's Office, the Attorney General's Office or other appropriate entity for the potential recovery of funds or other suitable action.	

## VI. Procedure

### A. Level 3 = \$100,000^

RESPONSIBLE PARTY	REQUIRED ACTION	NOTE/COMMENT
Program Administrator	1. Once, between October 1 and January 31, once between February 1 and May 31 and once between June 1 and September 30 of each year, the PA responsible for the Grant shall conduct an on-site monitoring session utilizing approved GTSB monitoring form(s).	Requires 3-on-sites per year.
	2. Discuss deficient areas with the grantee representative, if any are identified that indicate a consistent pattern of non-compliance over a 3-month period. Note	

	outcome on approved GTSB monitoring form(s).	
	3. Discuss non-compliant areas with grantee immediately or within 7 calendar days from date of on-site visit and identify remedies that will be implemented to correct the non-compliant areas. Utilize approved GTSB monitoring form(s) to detail corrective actions to be taken by grantee.	
	4. Furnish a hard or electronic copy of approved GTSB monitoring form(s) to the grantee.	
	5. If, during the on-site monitoring session, discrepancies are discovered that may be considered fraud or internal misuse of funds, the PA will copy all relevant documents and turn them over to the BC.	
	6. Forward all completed original monitoring forms to Monitoring File Manager	
Grantee	7. Within 21 calendar days from the onsite visit sign and return approved GTSB monitoring form(s) verifying corrective actions identified have been implemented and the non-compliant area(s) is(are) in compliance.	
Program Administrator	8. If grantee does not comply with corrective actions by the required date, advise the grantee agency head that the contract is out of compliance and future reimbursements may be withheld if corrective measures are not implemented and verified.	
Monitoring File Manager	9. If grantee does not comply with corrective actions, discuss with BC and PA and prepare a memorandum of intent to cancel the contract and send by certified mail to grantee agency head.	
	10. If grantee does still not comply with corrective actions, discuss with BC and PA and prepare a memorandum canceling the contract and send by certified mail to grantee agency head.	
	11. Update monitoring file as needed through life of grant cycle.	
	12. Provide copies of all monitoring forms to Grant Administrator.	
Grant Administrator	13. Note receipt of monitoring forms in tracking report.	

	14. File monitoring forms in master grant file.	
	15. When applicable, provide each PA with a monthly Tracking Report Summary, <a href="#">GTSB Form 64</a> .	
Bureau Chief	16. If a PA turns over documents that indicate a possible fraud or misuse of GTSB funds and the BC concurs that there is a fraud/misuse possibility, the BC will provide the relevant documentation to the Division of Criminal Investigation for further investigation.	
	17. If, after an investigation, it is determined that the grantee did commit fraud or misuse of GTSB funds, the BC will notify the grantee of the finding, inform them their GTSB contract is cancelled, and consult with the County Attorney's Office, the Attorney General's Office or other appropriate entity for the potential recovery of funds or other suitable action.	

## VII. Procedure

### A. sSTEP Grantees

RESPONSIBLE PARTY	REQUIRED ACTION	NOTE/COMMENT
Program Administrator	1. Once, between November 1 and September 30 of each year, the <i>PA</i> responsible for the grant shall conduct a monitoring session utilizing approved GTSB monitoring form(s).	Requires 1-on-site per year for agencies new to the program or agencies that have not been in the program for more than two years.
	2. Discuss deficient areas with the grantee representative, if any are identified that indicate a consistent pattern of noncompliance over a 3-month period. Note outcome on approved GTSB monitoring form(s).	
	3. Discuss non-compliant areas with grantee immediately or within 7 calendar days from date of on-site visit and identify remedies that will be implemented to correct the non-compliant areas. Utilize approved GTSB monitoring form(s) to detail corrective actions to be taken by grantee.	
	4. Furnish a hard or electronic copy of approved GTSB monitoring form(s) to the grantee.	

	5. If, during the on-site monitoring session, discrepancies are discovered that may be considered fraud or internal misuse of funds, the PA will copy all relevant documents and turn them over to the BC.	
	6. Forward all completed original monitoring forms to Monitoring File Manager	
Grantee	7. Within 21 calendar days from the onsite visit sign and return approved GTSB monitoring form(s) verifying corrective actions identified have been implemented and that the non-compliant area(s) is(are) in compliance.	
Program Administrator	8. If grantee does not comply with corrective actions by the required date, advise the grantee agency head that the contract is out of compliance and future reimbursements may be withheld if corrective measures are not implemented and verified.	
Monitoring File Manager	9. If grantee does not comply with corrective actions, discuss with BC and PA and prepare a memorandum of intent to cancel the contract and send by certified mail to grantee agency head.	
	10. If grantee does still not comply with corrective actions, discuss with BC and PA and prepare a memorandum canceling the contract and send by certified mail to grantee agency head.	
	11. Update monitoring file as needed through life of grant cycle.	
	12. Provide copies of all monitoring forms to Grant Administrator.	
Grant Administrator	13. Note receipt of monitoring forms in tracking report.	
	14. File monitoring forms in master grant file.	
	15. When applicable, provide each PA with a monthly Tracking Report Summary, <a href="#">GTSB Form 64</a> .	
Bureau Chief	16. If a PA turns over documents that indicate a possible fraud or misuse of GTSB funds and the BC concurs that there is a fraud/misuse possibility, the BC will provide the relevant documentation to the Division of Criminal Investigation for further investigation.	



	<p>17. If, after an investigation, it is determined that the grantee did commit fraud or misuse of GTSB funds, the BC will notify the grantee of the finding, inform them their GTSB contract is cancelled, and consult with the County Attorney’s Office, the Attorney General’s Office or other appropriate entity for the potential recovery of funds or other suitable action.</p>	
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**Related Federal Directive**

**Title 2, Sub. A, Chapter II, Part 200, Sub. D**

**§200.328 Monitoring and reporting program performance.**

- (a) *Monitoring by the non-Federal entity.* The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by the non-Federal entity must cover each program, function or activity. See also §200.331 Requirements for pass-through *entities*.
- (b) *Non-construction performance reports.* The Federal awarding agency must use standard, OMB-approved data elements for collection of performance information (including performance progress reports, Research Performance Progress Report, or such future collections as may be approved by OMB and listed on the OMB Web site).
  - (1) The non-Federal entity must submit performance reports at the interval required by the Federal awarding agency or pass-through entity to best inform improvements in program outcomes and productivity. Intervals must be no less frequent than annually nor more frequent than quarterly except in unusual circumstances, for example where more frequent reporting is necessary for the effective monitoring of the Federal award or could significantly affect program outcomes. Annual reports must be due 90 calendar days after the reporting period; quarterly or semiannual reports must be due 30 calendar days after the reporting period. Alternatively, the Federal awarding agency or pass-through entity may require annual reports before the anniversary dates of multiple year Federal awards. The final performance report will be due 90 calendar days after the period of performance end date. If a justified request is submitted by a non-Federal entity, the Federal agency may extend the due date for any performance report.
  - (2) The non-Federal entity must submit performance reports using OMB-approved government wide standard information collections when providing performance information. As appropriate in accordance with above mentioned information collections, these reports will contain, for each Federal award, brief information on the following unless other collections are approved by OMB:
    - (i) A comparison of actual accomplishments to the objectives of the Federal award established for the period. Where the accomplishments of the Federal award can be quantified, a computation of the cost (for example, related to units of accomplishment) may be required if that information will be useful. Where performance trend data and

analysis would be informative to the Federal awarding agency program, the Federal awarding agency should include this as a performance reporting requirement.

(ii) The reasons why established goals were not met, if appropriate.

(iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

(c) *Construction performance reports.* For the most part, onsite technical inspections and certified percentage of completion data are relied on heavily by Federal awarding agencies and pass-through entities to monitor progress under Federal awards and subawards for construction. The Federal awarding agency may require additional performance reports only when considered necessary.

(d) *Significant developments.* Events may occur between the scheduled performance reporting dates that have significant impact upon the supported activity. In such cases, the non-Federal entity must inform the Federal awarding agency or pass-through entity as soon as the following types of conditions become known:

(1) Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the Federal award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation.

(2) Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more or different beneficial results than originally planned.

(e) The Federal awarding agency may make site visits as warranted by program needs.

(f) The Federal awarding agency may waive any performance report required by this part if not needed.