



Rehabilitation Services  
Commission

# Monitoring Programs & TPCAs

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# Glossary of Terms

- RSA – Rehabilitation Services Administration (federal oversight)
- RSC – Rehabilitation Services Commission
- VR – Vocational Rehabilitation (employment)
- BVR – Bureau of Vocational Rehabilitation
- BSVI – Bureau of Services for the Visually Impaired
- VRP3 – VR Public & Private Partners
- RPS – Rehabilitation Program Specialist
- TPCA – Third Party Cooperative Arrangement
- TLF – Time Limited Funds
- MOU - Memorandum of Understanding
- PIE – Program Integrity & Evaluation
- FMCU – Fiscal Monitoring and Compliance Unit
- OMB – Office of Management & Budget (federal)
- IPE – Individual Plan for Employment

# Funding Chain

Rehabilitation Services Administration



Rehabilitation Services Commission



Primary Contractor



Subcontractor(s)

# What do these two have in common?

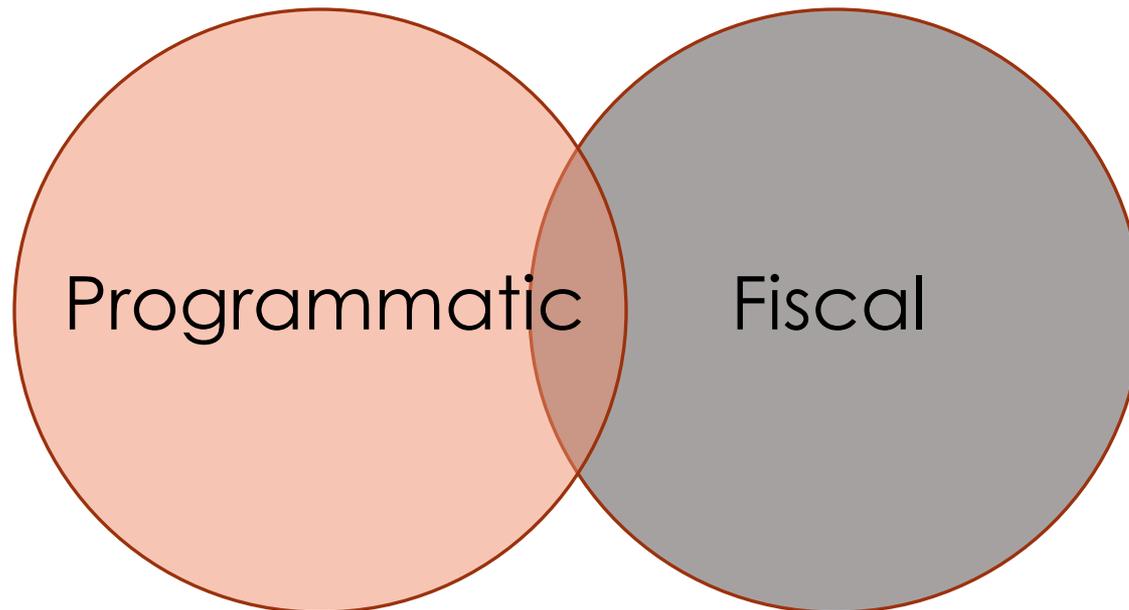
**Monitoring  
and  
Evaluation**

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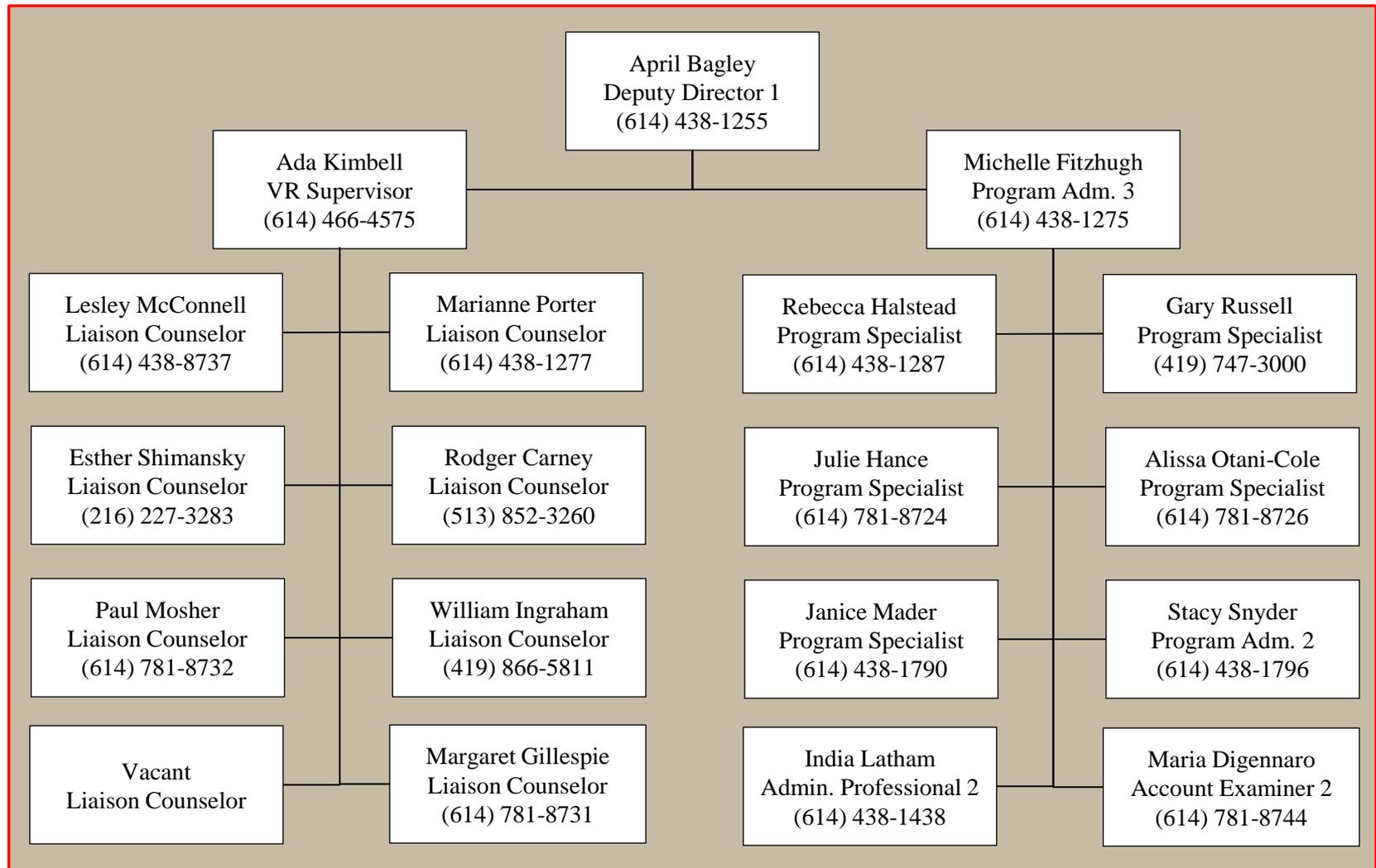


Monitoring Programs & TPCAs

# Two Major Components of the Monitoring Process

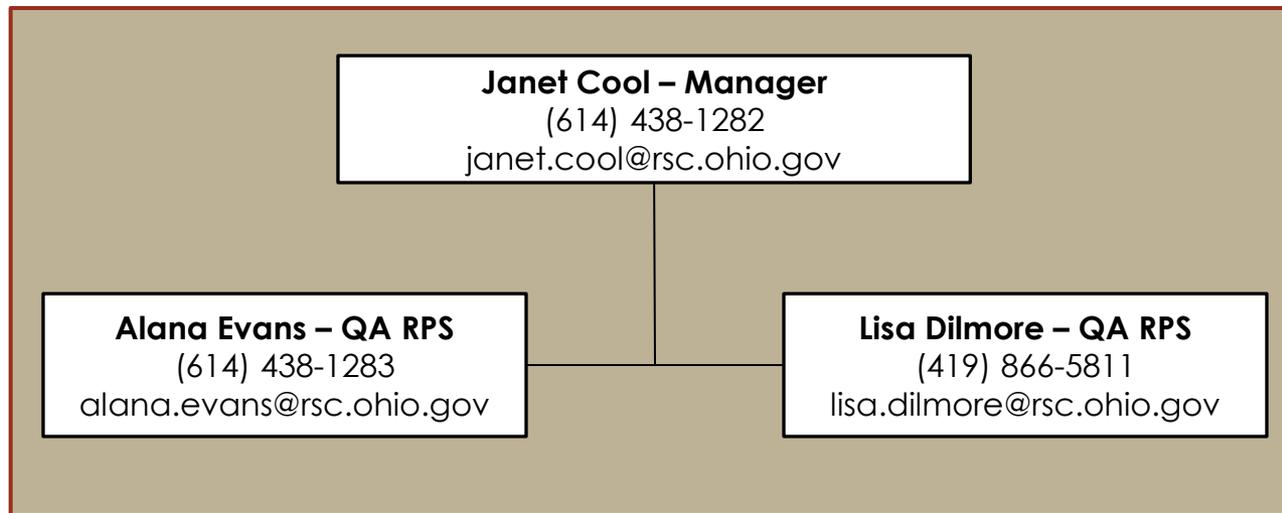


# VRP3 Program Staff – Who We Are



# Program Monitors – Who We Are

## Program Integrity & Evaluation



“Ringing the Bell”

VS.

“Dinging the Bell”

- Develop systems to build compliance from the front end
- Work with partners/stakeholders to communicate this emphasis
- We want you to succeed

# What We Monitor

- All TPCAs (VRP3s and others)
- Independent Living/Older Blind Agreements
- Independent Living Agreements
- Community Centers for the Deaf Agreements
- Personal Care Assistance Agreements

# Monitoring process

## 1. Who will evaluate?

- Rehabilitation Program Specialist, Manager, PIE staff, Fiscal staff, RSA (federal)

## 2. What will be evaluated?

- Documentation of deliverables/outcomes
- Accounting procedures and supporting documentation

## 3. When will the evaluation occur?

- On-going; schedule based on risk assessment

## 4. Where will the evaluation occur?

- Remotely (desk reviews at RSC)
- Onsite (at the program site)

## 5. How will the evaluation occur?

- In accordance with the Program Monitoring policy (30-QA-03) and the Contract Management Handbook for TPCAs

# Why Monitor?

## Programmatically:

- To ensure that consumers receive plans, services, and employment outcomes that are consistent with VR goals and standards
- To determine whether or not a contract should be continued and/or renewed

# Contract Language

## Exhibit A Section 5: Monitoring, Evaluation and Reporting (Part 1)

- A. RSC shall conduct, and the Contractor shall cooperate with, quality assurance evaluations and periodic reviews to assess the Project's progress and achievements.
  - 1) If RSC determines that Contractor has not complied with a required term of this contract, in addition to any other rights and remedies available, RSC may require Contractor to submit a corrective action plan to resolve any deficiencies within 30 days of said request to Contractor.
- B. Contractor is responsible for ensuring that they are well versed in the services provided by their RSC approved subcontractor and that the subcontractors are delivering quality services at the level determined by the Project Coordinator.

# Contract Language

## Exhibit A Section 5: Monitoring, Evaluation and Reporting (Part 2)

C. Contractor shall cooperate with the following monitoring and evaluation requirements:

- 1) Contractor staff shall be responsible for coordinating and preparing information for fiscal and programmatic monitoring and evaluation activities, as determined by RSC;
- 2) Contractor shall submit a quarterly review report, on the format provided by RSC, summarizing the current status of the Project, achievements, and any issues/concerns that need to be addressed; and
- 3) Contractor shall perform monitoring review as set forth in the RSC Policy 30-QA-01, "Programmatic Case Reviews for VR" and Procedure 30-QA-01-01, "Performance-based Case Review for VR" with a minimum requirement of five (5) case review/observations per year per VR Coordinator.

D. Contractual staff shall participate in all meetings determined necessary by RSC.

E. Contractor shall cooperate with RSC's attendance at Contractor team meetings.

# Programmatic Monitoring Review Form

## A. Quality & Learning/Growing

### Case Process

B. VR Referral

C. Application

D. Eligibility

E. Order of Selection

F. IPE Development and Implementation

G. Service Delivery

H. Employment Outcomes

# Programmatic Monitoring Review Form (cont'd)

- I. Case Review Total Score
- J. Customer Satisfaction
- K. Reports
- L. General
- M. Need for Corrective Action/Follow-Up
- N. Risk Level
- O. Stakeholder Feedback
- P. Reviewer Signatures
- Q. Program Integrity & Evaluation Review

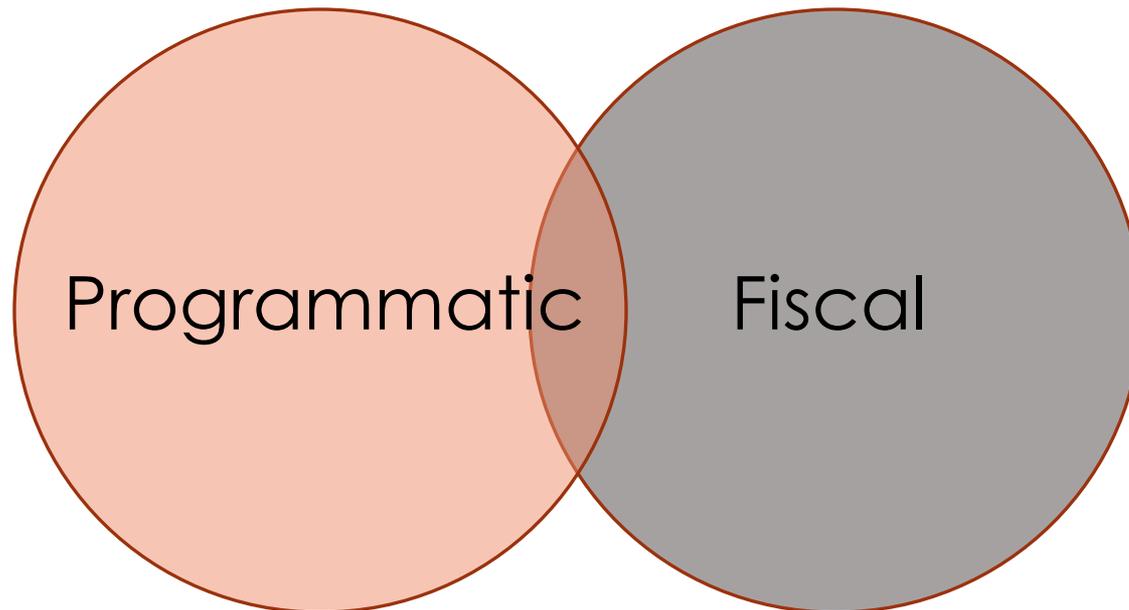
# Monitoring Review Form Timelines

- All Quarterly Reports must be submitted to the VRP3 RPS no later than the 15th of January, April, July and October.
- VRP3 RPS and Fiscal staff will utilize the Quarterly Reports and any additional supporting documentation while conducting the monitoring review.
- Results of the review will be entered into the RSC database.

# Monitoring Review Form Process

- *Partners/stakeholders staff will be responsible for providing RPS with the information to support all of these areas. (designated on the Review Form)*
- *Monitoring will be completed by Rehab. Program Specialists and Fiscal Specialists on an on-going basis both electronically and on-site.*
- *PIE staff will provide ongoing support throughout the life of the arrangement*

# Two Major Components of Monitoring Process



# Fiscal - Who We Are

## RSC Division of Fiscal Management

Finance (AP, AR)

Budget

Fiscal  
Monitoring and  
Compliance  
Unit (FMCU)

### FMCU

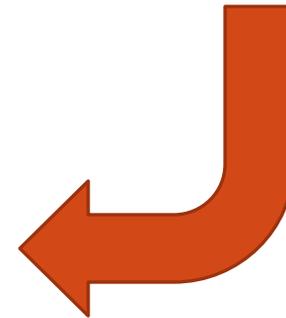
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Monitoring Programs & TPCAs

# Why Monitor?

## Fiscal:

To minimize the financial risk to which all stakeholders are exposed

# Contract Language

## Standard Terms and Conditions

### Section 10. – Record Keeping and Audits

- a. During the performance of this Agreement and for a period of three years after its completion, **Contractor agrees to maintain a proper system of accounting and auditable records, in a manner consistent with generally accepted accounting principles, to account for the expenditure of all funds provided by this agreement, including any and all direct and indirect costs expended, and to make these records available for review upon request by RSC representatives at all reasonable times, including regular working hours.** Contractor further agrees to retain all records and reports for a period of not less than three years following audits by the appropriate state and federal auditing agencies or until questions arising from the audit have been resolved, whichever is later.

# Source of Monitoring Elements

- Rehabilitation Services Administration (RSA)  
Vocational Rehabilitation Program  
**FY 2013 Monitoring and Technical Assistance Guide**  
[www.rsa.ed.gov](http://www.rsa.ed.gov)
- Code of Federal Regulations
- OMB Circulars

## What Does Fiscal Monitoring Involve?

### Purpose of the FMCU:

- Review and Monitor fiscal procedures related to the execution of cooperative agreements
- Ensure compliance with Federal Regulations, State Laws, and Federal OMB Circulars
- Provide technical assistance to RSC partners



**MINIMIZE THE FINANCIAL RISK TO RSC AND OUR PARTNERS**

## What Does Fiscal Monitoring Involve?

Goals of the FMCU:

- Conduct at least one monitoring event per fiscal year for every partner engaged in a cooperative agreement with RSC
  - Some partners may receive desk reviews rather than site visits.
  
- Minimize questioned cost findings resulting from subsequent fiscal audits of monitored agreements

# What Does Fiscal Monitoring Involve?

Monitoring  $\neq$  Auditing



Monitoring



Auditing

# Fiscal Monitoring

## Processes and Procedures:

- Research, collect preliminary documentation
  - RFP, Agreement (contract), Amendments, Budget Document
  - Indirect Cost Plan, Cost Allocation Plan
  - Prior audit report
  - Selected vouchers and POs for testing

# Fiscal Monitoring

## Processes and Procedures (cont'd):

- ❑ Conduct Monitoring Visits
  - Identify key fiscal personnel (CFO, accountant, etc.)
  - Review accounting policies and procedures
  - Examine accounting system
  - Identify accounting codes related to agreement
    - Chart of Accounts
  - Test accounting accuracy (sample invoices)

# Fiscal Monitoring

## Processes and Procedures (cont'd):

- ❑ Conduct Monitoring Visits (cont'd)
  - Special Cost Categories
    - Staff salaries/wages – Personnel Activity Reports
    - Staff travel costs
    - Rent allocations
    - Utility allocations
    - Equipment costs, inventory list
    - Supply costs and other overhead allocations

# Fiscal Monitoring

## Processes and Procedures (cont'd):

### ❑ Technical Assistance

- CFR and OMB Circular standards for fiscal management
- Documentation requirements

### ❑ Invoice review and approval

- Intercept selected invoices prior to payment
- Gather supporting documentation
- Authorize payment

# Fiscal Monitoring

Interaction with other monitoring functions:

- ❑ Monitoring visits in conjunction with Program Integrity and Evaluation staff and Rehabilitation Program Specialist
  
- ❑ Link to RSC Auditors
  - Monitoring reports serve as preliminary documentation for audits
  
  - Referral to auditors if monitoring activities indicate audit is needed prior to end of agreement period

# Summary of Monitoring Roles

- Contractor - submits quarterly reports and information to support completion of items on the Monitoring Review Forms
- RSC Program staff (Program Specialists) – (Alissa, Becky, Gary, Jan, Julie) completes the Program Monitoring Review Form
- Program Integrity & Evaluation (Janet, Lisa, Alana) – Initial training and technical assistance, assists in development of corrective action plans, reviews all reports
- Fiscal (Steve, Toby, Tamara, Scott, Lisa) – Initial training and technical assistance, ongoing monitoring, and follow up on fiscal items

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# Questions?