

SOP 22-07
Non-formula Grant Performance Management
Standard Operating Procedures
Southwest Indiana Workforce Region 11
Approval Date: 01/27/2023

Purpose

This policy intended to cover most non-formula grants issues by DWD will:

- Identify DWD grant management strategies
- Establish grantee performance expectations
- Identify related technical assistance strategies, and
- Identify potential consequences for grant underperformance.

References

- Workforce Innovation and Opportunity Act (WIOA) Section 116
- 2 CFR 200-208
- 2 CFR 200.303(a)
- 2CFR 200.339
- 2CFR 200.400©
- US Department of Labor Employment and Training Administration (USDOL/ETA) Grantee Handbook Effectively Managing Competitive Grants, Issued June 2020

Content

- The authorized timeline for grant planning and implementation is the period of performance (POP) that includes all grant activities, performance outcomes, and grant expenditures.
- Depending on the type of grant that is awarded, grant performance indicators may apply to funding opportunities (e.g., National Dislocated Worker Grants (NDWG) and applicable Rapid Response grants, while other grants may require performance measures to be defined and agreed upon by the grantor and grantee within the grant application or proposal and/or the Statement of Work. Together this is the Project Plan.
- Most awards have enrollment and expenditure goals as foundational performance measures.

DWD Grant Management Strategies

Based upon the type of grant, DWD will implement any or all the following grant management strategies:

- Grant review meetings will:
 - Review grant performance
 - Address concerns
 - Answer questions, and
 - Provide technical assistance
- Proactive communication includes:
 - Reporting implementation and management challenges to the grant manager as well as the Regional Support Manager (RSM)
 - DWD will promptly respond with technical assistance
- On-site implementation visits may include:
 - A scheduled on-site or virtual visit within the first six months of the grant
- Progress reviews that consist of periodic reviews of grant performance
- Statewide roundtables coordinated and hosted by DWD may:
 - Share programmatic, operational, and fiscal information
 - Provide a forum for discussion of grantee challenges/promising practices.
- Grant reports may:
 - Require submission of grant activity reports, and
 - Report content will depend on the requirements/guidelines of the grant
- Routine DWD monitoring will include:
 - Non-formula grants, and
 - All DWD grant management documentation will be made available for monitoring purposes

DWD Grant Management: Progress Review

- Progress reviews:
 - Support the success of the grantee
 - Ensure early identification of performance issues, and
 - Support grantees with timely resolution.
- Reviews will occur at least quarterly and may include the following data:
 - Project Plan
 - Grantee reports
 - Invoices
 - DWD system reports
 - Fiscal data, and
 - Participant electronic records.
- Review will focus on the following accountability criteria:
 - Grant activities and milestones
 - Expenditures
 - Established deliverables

- Applicable performance indicators
- Case management practices and
- Additional criteria based on newly received guidance, unique funding opportunities requirements, and
- Special projects.

Project plans will identify quantitative deliverables based on the metrics above for the first 90 days and then at 25%, 50%, and 75% of the grant period.

Example:

Q1	End of Q2 (25% of POP)	Q3	End of Q4 (50% of POP)	Q5	End of Q6 (75% of POP)	Q7	End of Q8
Short-term (90) days deliverables	Deliverables (D)	(D)	Deliverables (D)	(D)	Deliverables (D)	(D)	Final Performance Outcomes

It is recognized that outcomes and expenditures for a period of performance may be impacted by the date of availability of funds to the grantee. Considerations will be made prior to any actions taken.

NOTE: Grantees are encouraged to proceed with project implementation upon receipt of the notice of award letter to ensure timeline milestones are achieved while contracts are finalized.

DWD Grant Management Performance: Concern Levels

- “Concern” is to be understood as to the extent to which a grant is in jeopardy of underperformance based on actual progress and projected benchmarks, deliverables, and expenditures.
- To produce a picture of grant performance, DWD grant managers conduct periodic progress reviews to identify performance issues. Concern levels are based on:
 - The number of identified issues
 - The severity of the issue(s), and
 - The time remaining in the period of performance.
- Concerns are generally categorized as follows:
 - No concern
 - ✓ Grantee is meeting expectations for all the accountability criteria
 - Low concern
 - ✓ Grantee is not meeting expectations for one of the accountability criteria
 - Moderate concern
 - ✓ Grantee is not meeting expectations for two of the accountability criteria
 - High concern
 - ✓ Grantee is not meeting expectations for three or more of the accountability criteria

Note: While these levels are generally applicable, a situation may arise where a single issue warrants a high level of concern.

DWD grant managers will communicate concern category information, grant progress, performance issues, and concern levels to grantee throughout the period of performance. Grant managers and grantees will work together to address concerns to ensure successful outcomes.

DWD Grant Management: Performance Intervention Strategies

DWD may implement the following strategies:

1. Individual technical assistance
2. More frequent grant progress reviews and review meetings
3. Statewide roundtables to identify contributing factors and develop resolution strategies
4. Develop an improvement plan
5. Grant SOW modification to better support positive outcomes, and
6. Other interventions deemed appropriate by DWD.

DWD Grant Management: Lack of Performance Progress

Quantitative deliverables in the Project Plan are to be identified with periodic progress points of the period of performance. Actual performance should be within 80% of target deliverables to ensure performance outcomes are achieved by the end of the grant.

Example:

Percent of POP	Expectation (Actual Performance)	Potential Actions
90 days	Within 80% of target deliverables	Any or all interventions described above may be initiated or escalated.
25%	Within 80% of target deliverables	Any or all interventions described above may be initiated or escalated.
50%	Within 80% of target deliverables	-Any or all interventions described above may be initiated or escalated. -Grant funds may be frozen until performance is within the acceptable percentage. -Funds may be withdrawn for redistribution
75%	Within 80% of target deliverables	-Any or all interventions described above may be initiated or escalated. -Grant funds may be frozen until performance is within the acceptable percentage. -Funds may be withdrawn for redistribution
100%	100% of deliverables	Access to future non-formula grant opportunities may be returned.

- Grantees will be notified in writing of:
 - any action that will be taken
 - the reason the action is being taken, and
 - what steps that will need to be taken to remove the action (if applicable).

- If a grantee disagrees with an action taken due to underperformance, they must contact their grant manager for next steps. Additional information or data provided by the grantee may result in adjusted actions.
- In addition to the protocols of this SOP, grant performance outcomes will be reviewed and assessed during routine DWD grantee monitoring; this may result in monitor findings and corrective action requirements.

Action

- Contents of this policy will be shared with all appropriate stakeholders in Region 11.
- Region 11 will fully participate in DWD grant management strategies to ensure that performance deliverables are met.

Effective Date

Immediately

Ending Date

Upon rescission