Subrecipient Monitoring

With You Today

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Subrecipient Monitoring

Subrecipient Monitoring and Management

2 CFR 200.332 Requirements for pass-through entities:

2 CFR 200.332 (b): All pass-through entities must evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as:

1. The subrecipient's prior experience with the same or similar subawards.
2. The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F of this part, and the extent to which the same or similar subaward has been audited as a major program.
3. Whether the subrecipient has new personnel or new or substantially changed systems.
4. The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).

Subrecipient Monitoring and Management

2 CFR 200.332 Requirements for pass-through entities:

2 CFR 200.332 (e): Depending upon the pass-through entity's assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:

1. Providing subrecipients with training and technical assistance on program-related matters.
2. Performing on-site reviews of the subrecipient's program operations.
3. Arranging for agreed-upon-procedures engagements as described in § 200.425.

Subrecipient Monitoring Audit Finding

Compliance Requirement

Finding

The Recipient did not correctly provide all required subaward information to Subrecipients or evaluate each Subrecipient's risk of noncompliance for the purpose of determining the appropriate Subrecipient monitoring and consequently, the Recipient could not demonstrate that monitoring performed was based on risk.

Recommendation

We recommend that the Recipient evaluate each Subrecipient's risk of noncompliance for the purpose of determining the appropriate Subrecipient monitoring and conduct Subrecipient monitoring based on the risk assessment.

Florida Recovery Obligation Calculation (F-ROC) Overview

F-ROC Overview

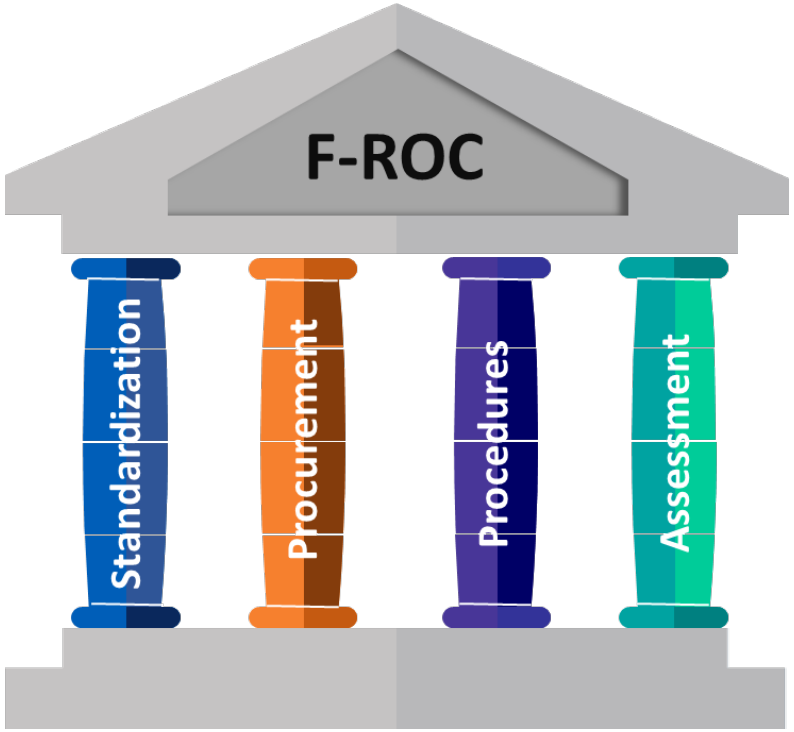
The State-sponsored F-ROC program addresses current-state challenges by encouraging a proactive and streamlined approach to recovery, reducing risk, and implementing measures that enhance Applicants' ability to successfully navigate the Public Assistance process.

PILLAR 1: STANDARDIZATION

F-ROC standardizes and simplifies forms, making it easier to **submit accurate documentation** for Public Assistance and receive funding timely.

PILLAR 2: PROCUREMENT

F-ROC helps you to ensure you have contractors and vendors in place and your **procurement plans meet federal regulations**.



PILLAR 3: PROCEDURES

F-ROC helps you prepare for events by ensuring you have **policies and procedures** that are accurate, **up-to-date**, and follow **FEMA guidelines**.

PILLAR 4: ASSESSMENT

The Disaster Readiness Assessment provides you with the insights needed to be successful. Applicants who employ all four pillars of the program can receive **up to 85% of funding** upon obligation.

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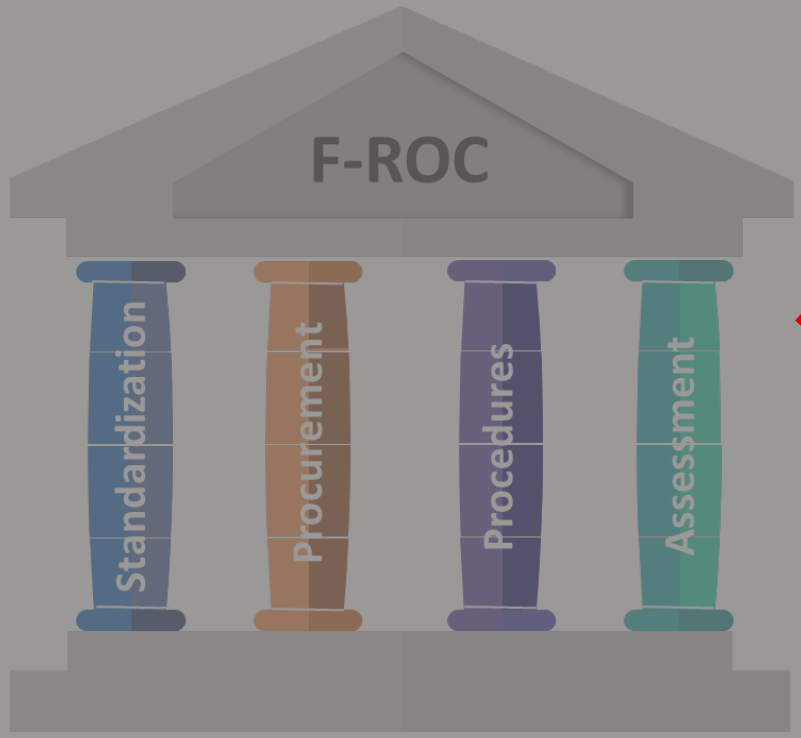

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Disaster Readiness Assessment

Readiness Assessment

- Compliance questionnaire
- Questions are broken down into five categories
- 38 parent questions
  - *81 total questions*
- All questions include the required regulation and reference the specific requirement
- Assessment score → risk rating

1. Applicant Experience
2. Procurement
3. Policy and Procedure
4. Documentation
5. Contract Administration

Readiness Assessment

What it is

Applicants complete and submit an online risk self-assessment questionnaire based on the Recipient's approved evaluation criteria to assess FEMA PA program compliance risk. Based upon the responses provided and review of the supporting documents, pre-disaster compliance risk ratings are assigned.

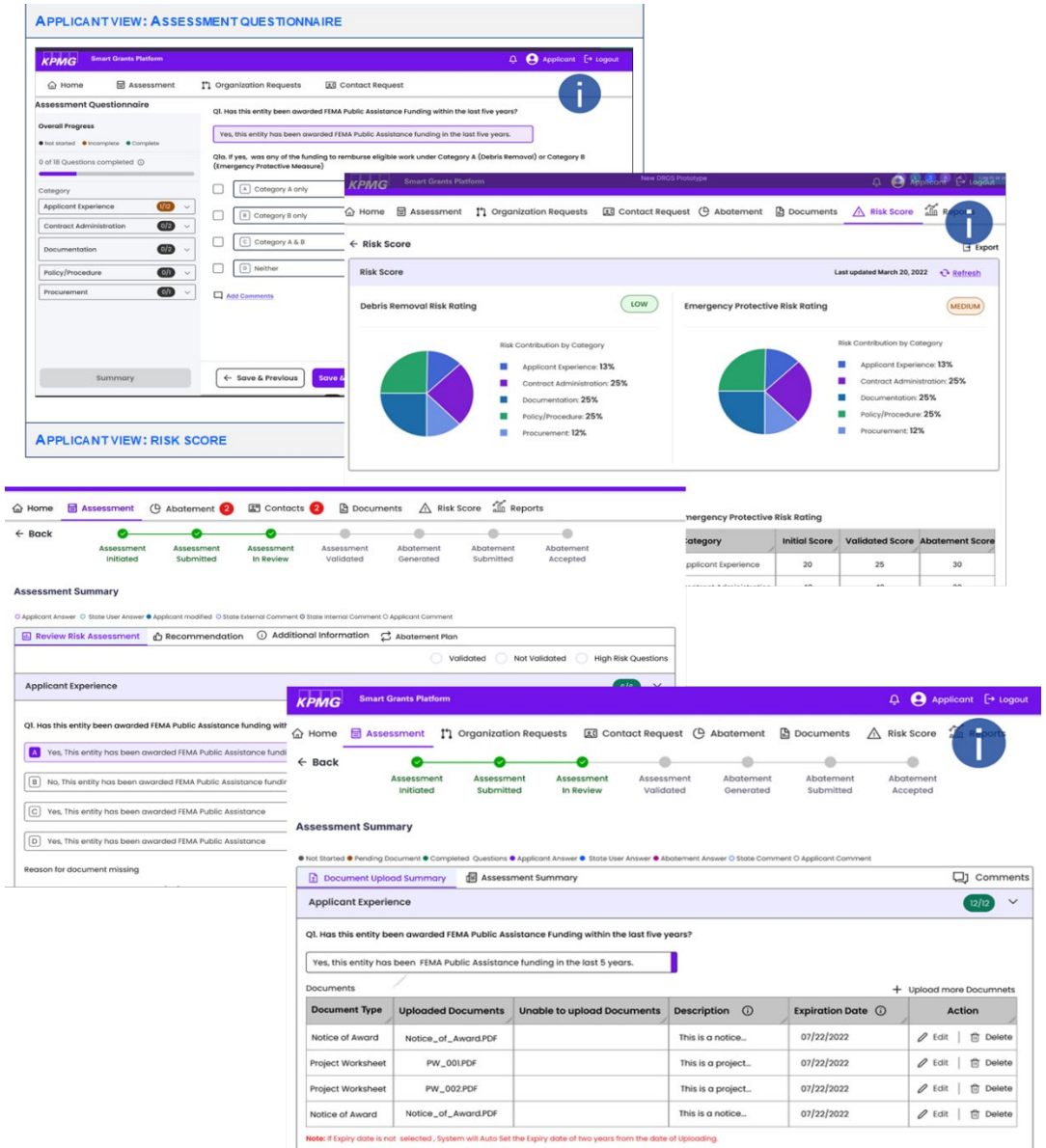
All questions were drafted utilizing Stafford Act, Public Assistance Program and Policy Guide (PAPPG), Procurement Disaster Assistance Team (PDAT) Field Manual, Code of Federal Rule and Regulation and specific state statutes and requirements.

The questionnaire is specifically tailored to the Recipient's and Applicant's biggest risks leading to deobligation and delay in reimbursement.

How it works

Applicant: An Applicant answers a series of questions covering the FEMA PA Categories, state requirements, and processes that are ultimately reviewed by the Recipient to determine the Applicant's pre-disaster compliance risk score or rating.

Recipient: The Recipient reviews Applicants' answers and supporting documentation and provides feedback for follow-up to allow an Applicant the opportunity to address the high or moderate risk areas.



Abatement Plan

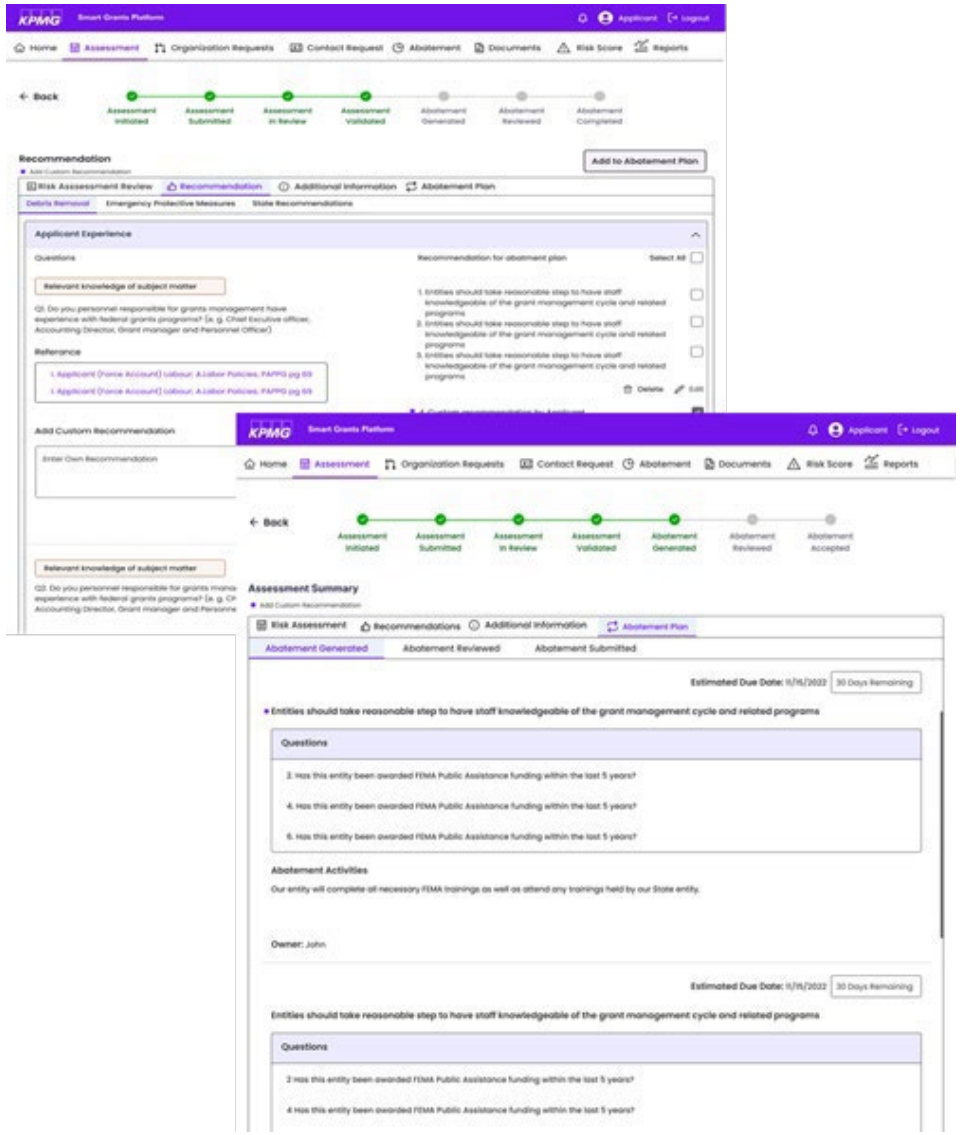
What it is

Individual and tailored recommendations and abatement plans are generated for each Applicant, focused on improving Applicants' program knowledge and compliance with the CFR and administration of the FEMA PA grant.

How it works

Applicant: The module allows for individual Applicants to develop an abatement plan to address risks identified during the risk assessment process. Additionally, the risk assessment and abatement plans can be used by the Applicant to better understand any vulnerabilities.

Recipient: Establishes an interactive process for capturing and monitoring mitigation or abatement plans.



Document Repository

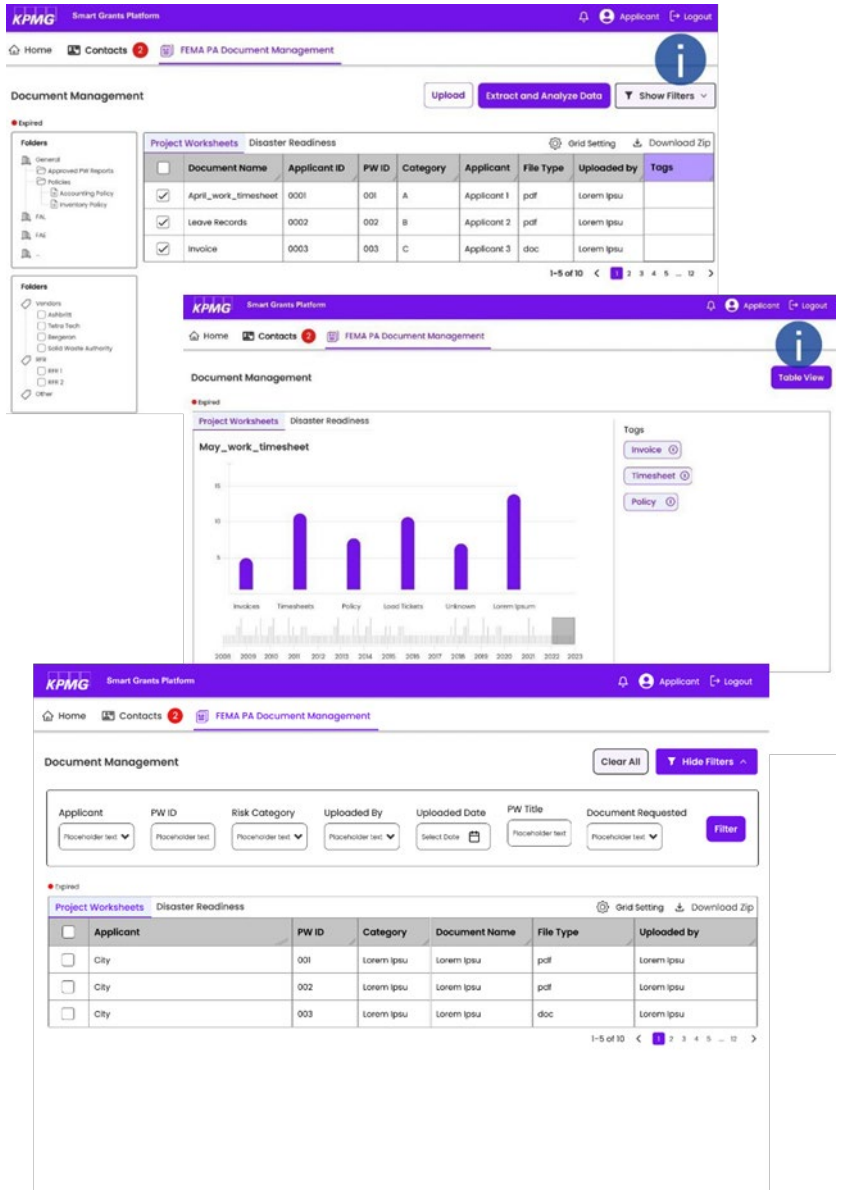
What it is

Applicants submit supporting documentation in a central repository. Documents are converted into text and automatically classified key data points are extracted and saved in a machine-readable format.

How it works

Applicant: Submit documentation supporting their readiness assessment in a central repository. View any previously uploaded documents and their status.

Recipient: Requested documentation is uploaded by the Applicant. The documents are reviewed for compliance. The status and history of documents are maintained by the solution.



QUESTIONS?

FloridaDisaster.org/FROC