

**Background:**

Three technical assistance discussion on Regional Grant Management and Administration were held in November 2019 for the purpose of discussing the principles and policies put forth by the CWDB and EDD in the WSD18-16 – Guidance on Regional Awards and brainstorming ideas to increase efficiency and streamline the management of regional awards. Input received from these sessions has been consolidated into the following recommendations and presented to CWDB and EDD Executive Leadership to improve regional grants management.

Recommendation	Proposed actions to implement recommendations:
<p><b>1. Define the selection process for regional awards as a State-level competitive procurement with Regional Partnerships as the “eligible applicants”.</b></p>	<ul style="list-style-type: none"> <li>• CWDB Policy is to award regional funds through a competitive procurement process which occurs at the state level. Eligible Applicants are regional partnerships that join together to apply for state funds.</li> <li>• Regional Plan guidance and/or the RFA should include a description of the process used to develop regional partnerships. CWDB will approve these partnerships as part of the regional plan or application approval process. Regional Guidance, RFAs and subgrants should clearly state:                         <ul style="list-style-type: none"> <li>• Partnership building requires time for regions to select partners and build regional applications. Timeframes for developing applications will include time for partnership building at the regional level (6-8 weeks minimum)</li> <li>• LWDB’s in each RPU determine the best approach to select partners and identify partners in the application. The process for selecting the partners should clearly reflect/justify that the process was fair, equitable, and focused on elements required in the grant.</li> <li>• Partners are selected by the Regions/LWDB based on RFA requirements and publicized criteria (“who” can deliver the services; bring point value up; leverage funds; etc</li> <li>• Partner selection process can be a leveraged procurement process, including, but not limited to:                                 <ul style="list-style-type: none"> <li>• A go-to list of partners included in the Regional Plan</li> <li>• Building on or modifying existing contracts for “same or similar” services</li> <li>• Request for Information (RFI) or Request for Qualifications (RFQ)</li> <li>• Eligible Provider list</li> <li>• Non-competitive procurement</li> </ul> </li> </ul> </li> </ul>

- RFAs/contracts/subgrants will include language that allows modification based on federal/state regulation or policy changes, and which allows augmentations and extensions for up to a 4-year period at the discretion of the State.
- RPU's should communicate the following to selected partners:
  - The State will determine who will get awarded, funding may change in the final award, and that final awards will be determined upon receipt of funding
  - RPU's may not add partners after submission of the application because the partnership supported the reason for the awarded amount.
  - RPU's must clearly outline process and justification that identifies how and why each partner was selected.
  - Ensure that a cost/price analysis is conducted.
- CWDB/EDD should communicate with the Compliance Monitoring staff regarding regional awards policies to ensure agreement and implementation in the monitoring guidelines.
- CWDB/EDD should include flexibility and time (at least 2 months) to develop complex partnerships in regions that have numerous local boards and/or service providers or restrictive local procurement rules to ensure fairness, access, and transparency in the selection of partners that specialize in services to target populations.
- Recommend using standard language and definitions in regional awards directive, RFAs and subgrant/contract exhibits to address partnership/roles/responsibilities.
- Revise Regional terms to be more consistent with partnership:
 

• Regional Partners	vs.	Service Providers/Sub-Contractors
• Regional Grant Manager	vs.	Regional Fiscal Agent
• Partnership	vs.	Procurement
• Modifying existing contracts	vs.	Piggybacking on procurement

<p><b>2. Develop a Grants Management Handbook that is provided to grantees early in the subgrant/contract process and includes requirements for State and Federal grants.</b></p> <ul style="list-style-type: none"> <li>• <b>Include a section which defines administrative costs for different fund sources and describes flexibility (where possible) in allocating costs.</b></li> <li>• <b>Include a section that shares examples of standardized contract language used by Local Area’s county counsels and procurement staff</b></li> </ul>	<ul style="list-style-type: none"> <li>• Establish and share grant application calendar/master schedule</li> <li>• Grants Management Handbook should include a consistent process, definitions, forms which will be applied to all initiatives and sections which call out specific regulations or requirements required by statute for individual regional grants:             <ul style="list-style-type: none"> <li>○ definitions</li> <li>○ required forms and directions for completing them</li> <li>○ report templates,</li> <li>○ timelines and expectations,</li> <li>○ examples of cost/price analysis tools and resources</li> </ul> </li> <li>• Grants Management Handbook should clearly define/lay out the Regional Grant Managers, Local Workforce Development Board, and State leadership (EDD, CWDB) roles in grant management process.</li> <li>• Regional funding should follow either the State-Funding guidelines (if State funds are used) or the federal Uniform Guidance funding rules (WIOA Title 1 for fiscal, admin, procurement) <b>EXCEPT</b> when it is specifically stated otherwise in the Request for Application (RFA) or contract.             <ul style="list-style-type: none"> <li>○ State Grants may include legislative requirements that are different from federal WIOA rules, but these will be stated in the RFA or contract.</li> <li>○ Most regional fiscal agents/grant managers are familiar with Federal Uniform Guidance CFR 200 and 2900, so basing grant management rules on Uniform Guidance, except when it is explicitly states otherwise in the RFA or contract, will make regional grant management go more smoothly.</li> </ul> </li> <li>• RGM responsibilities must be carefully defined and allocated, as these responsibilities are both administrative and program. Partnership building, regional coordination, regional training, and regional planning are program costs.</li> <li>• State funded grants may have different definitions and maximum % for administrative costs             <ul style="list-style-type: none"> <li>○ WIOA Section 683.215 (admin vs. Program)</li> </ul> </li> <li>• Include a section in Handbook that shares methods used by locals to streamline contracting process and examples of standardized contract language used by Local Area’s county counsels and procurement staff. Examples of methods to streamline contracting processes:</li> </ul>
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	<ul style="list-style-type: none"> <li>○ Regional Grant Manager (RGM) does the legal work in advance with local elected officials to approve a generic resolution to move funds to LWDB's once grants are awarded.</li> <li>○ RGM has agreements approved by County Council before grant is awarded.</li> <li>○ RGM has agreements/MOUs authorizing a pass-through of funds to local board fiscal agents</li> <li>○ RGM builds on (tags-on) an existing contract to provide additional "same or similar" services.</li> <li>○ RGM names partners in the application, indicating that they are the only provider of the service and the funding entity approves non-competitive procurement as allowed in the Uniform Guidance.</li> </ul>
<p><b>3. Develop a Monitoring Guide on requirements of regional grants and train grantees</b></p>	<ul style="list-style-type: none"> <li>• Focus on early intervention, corrective action and problem resolution, to reduce instances of questioned or disallowed costs.</li> </ul>

- The State should develop monitoring manual and tools and train RGM and LWDB's at the beginning of the subgrant/contract.
  - Create a workgroup which includes local/regional staff to develop monitoring protocols and tools based on existing guides but focused
  - Engage in peer discussions with Compliance Monitoring team.
  - Provide training on compliance/fiscal based monitoring guidance
- Clear and consistent State monitoring practices may empower more peer to peer monitoring approaches.
- There are five (5) ways to provide monitoring or oversight at the regional/local level:
  - Peer Review – local board in an RPU conduct peer review of another board.
  - Each LWDB monitors their program using local monitoring staff
  - State compliance monitoring staff conduct monitoring
  - Regional Grant Manager staff conducts monitoring
  - Contract monitoring out to a 3<sup>rd</sup> party
- Currently the Regional Awards Directive states that it is the responsibility of Local Board/Local Area in each RPU to:
  - Comply with state and federal regulations to safeguard regional, federal, and state funds allocated to the Local Area, including the following:
  - Ensure that awarded contracts are monitored, either by the Local Area that awarded the contract or a mutually agreed upon entity.
  - Implement corrective action for the contracts awarded by the Local Areas, including, if necessary, withholding cash payments pending corrective action, disallowing all or part of the activity or action, and/or wholly or partly suspending or terminating the contract award.
- Current State monitoring policies expect the Regional Grant Manager to provide oversight of the LWDB's within their RPU, putting the RGM in an awkward position because the primary focus of working regionally is partnership and collaboration.
  - LWDBs in each RPU should decide who will conduct monitoring from the options listed above and the RGM will be responsible for making sure that the monitoring will get done.
- Revise Guidance on Regional Awards Directive to clarify the state, regional and local roles in monitoring regional grants and to provide more detail on expectations on oversight and monitoring of regional grants,

<p><b>4. Pilot an alternative allocation/funding mechanism based on specific deliverables, work plans and budgets and as part of Regional MOU/Agreement, fund incrementally, and evaluate effectiveness of different allocation methodologies.</b></p> <p><b>Consider requesting waivers to alleviate administrative burdens</b></p>	<ul style="list-style-type: none"> <li>• Research how other States, State Departments, or State initiatives fund regional grants and develop pros and cons on methods of allocating regional funding.</li> <li>• Research impact of MOUs, Regional Agreements, and intermediaries on the efficiency of allocating funds regionally</li> <li>• Identify methods of supporting regional planning and regional decision making while allocating funding directly to partners identified in regional applications.</li> <li>• Create alternative regional funding pilot for regional awards which includes a plan for how the region will facilitate/coordinate regional decision making, outcomes and accountability while funds are allocated directly to specific partners. Applications must include             <ul style="list-style-type: none"> <li>○ Framework for regional decision making</li> <li>○ Process for ensuring accountability and key outcomes</li> <li>○ Fund in increments, dependent upon continued regional coordination</li> </ul> </li> <li>• Evaluate the current system of awarding regional funds to an RGM by comparing the regional engagement, collaboration, decision making, outcomes and accountability using different methods of allocating funds to RPU (RPI, P2E, SB1, GGRF).</li> </ul>
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