

**West Virginia**  
**Gaining Early Awareness and Readiness for Undergraduate Program**  
**(WV GEAR UP)**  
*Administered by the WV Higher Education Policy Commission*  
**Grantee Policy and Procedure**

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**Title of Policy:** Sub Recipient Monitoring

**Policy Implementation Level:** Coordinator of Fiscal and Administrative Services

**Effective Date:** FY 2022

**Responsibility:** Coordinator of Fiscal and Administrative Services

**Policy Statement:**

In accordance with OMB A-133, WV GEAR UP is required to comply with audit requirements which includes filing an A-133 audit as a Federal recipient expending greater than \$500k annually as well as ensure that our sub recipients that expend more than \$500k in total federal funding complete an A-133 audit. In addition, WV GEAR UP will conduct sub recipient monitoring of our grantees in the form of desk reviews (of invoices) to obtain a level of assurance that funds are being spent in accordance with the Statement of Work and budget outlined in the (sub) grant agreement.

**Procedure:**

1. OMB A-133 Annual Audit Submissions – When applicable, obtain copies of A-133 audits filed by our sub recipients - annually. Review the audits to ensure that no compliance issues are noted for the GEAR UP program. If compliance issues exist that may impact the program, correspondence will be drafted to address the issue and a response from the sub recipient will be requested. Audits will be due on or before March 31 each year (for the previous fiscal year) in line with A-133 requirements since all entities have a June 30 year end.
  - The three college partners will not have individual A-133 audits but will fall under the State’s A-133 audit.
  - The eleven Board of Education Offices - Audited financial statements must be completed in accordance with the WV Department of Education and Circular A-133 audit requirements and completed by their established deadline. We will follow any extension’s granted by the Department of Education. The county auditors will load the county audit on the WV State Auditor’s website and the GEAR UP Office will access the audit from this

site. This has been disclosed in the annual grant agreement (section 8.1).

- Other small grants will be monitored, mainly by invoice and report submission, and procedures will vary on a case to case basis.

The goal is not to create additional work on the sub recipient since they already are required to comply with A-133 but to monitor their existing submissions (mainly applicable for the 11 GU counties and college partners).

2. Desk Reviews – Sub Recipient Monitoring - In addition to reviewing the A-133 audit, a checklist will be compiled annually to monitor county and college partner grantees to ensure that they are in general compliance with the grant's statement of work (work plan) and the budget. A sample of monthly invoices will be reviewed and (applicable) source documents may be requested from the county treasurer to validate the charge to the grant and the specific line item. Invoices will be selected after mid year of grant to ensure significant grant activity. Section 8.2 of the grant agreement allows for additional information to be requested to validate compliance.

*Board of Education (GEAR UP Counties)*

- Each county's monthly invoice will be selected one time annually. A random sample of expenditures for the month selected will be evaluated and items reviewed will be documented on the checklist.
- Data for activities (SCRIBE) will also be reviewed to see if expenditures are in line with activities reported.
- Items that appear to be unreasonable will be addressed with the grantee and a corrective action plan will be detailed.
- Noncompliance may be addressed per the terms noted in the current year grant agreement.
- Note: Upon monthly invoice submissions, invoices are spot checked for reasonableness and reviewed to ensure billing is consistent with known grant activity. Any issues/correspondences will be filed with the invoice.

*College Partners*

- One month of invoices per grant will be reviewed to ensure grant is in compliance. Backup documentation per randomly selected items may be requested.
- At year end, regional program directors will provide documentation of incentives purchased and additional documentation of who received the award.

3. Programmatically, regional program directors will be monitoring activity to ensure the counties, specific to the region, are completing activities in line with the statement of work. They will also monitor invoice draw downs to determine if data (via SCRIBE) submission is reasonable to expenditures.

Communication will be maintained between all levels of GU staff (fiscal to programmatic functions) to ensure compliance and to guide the program.

4. Grant Payments

College Partners and County Board of Education's are paid on a monthly reimbursement basis per their grant agreement. Invoices are submitted against their approved budget. Since WV GEAR UP has such a small staff, the budgets and invoice process was developed to be able to monitor activity via the billing process. *Effective FY 2022, all grants will be on a schedule of payments except for the County Board of Educations (LEAs) since they are higher risk.* All grantees agreed to invoice on a reimbursement basis and no grantee has communicated cash flow problems. If this does occur, a different payment methodology will be developed to comply with the grantee's needs. By reviewing the invoice, along with the SCRIBE data, we are able to see if activity is occurring (or not occurring) in accordance to the grant.

As invoices are received, invoices are spot checked for reasonableness. Concerns will be sent to the county treasurer, site coordinator or county GEAR UP coordinator to address. Correspondence and review items are located in the invoice file. This process is in addition to the invoice review noted in this policy. The actual invoice desk reviewed will be noted in the monitoring file and actual workpapers will be located behind the invoice copy.

Other grants that are not completing the core mission of the grant will be paid on a schedule of payments. Reports and reconciliations will serve as the basis for monitoring compliance. If needed, additional information prior to review and close out will be requested to ensure compliance.