U.S. Department of Human Services
Administration for Children and Families
Office on Trafficking in Persons

ACF

Grant Monitoring Tool (GMT)

Updated 07/14/2021

Overview of the Office on Trafficking in Persons (OTIP) Grant Monitoring Tool (GMT) for Project Officers

Use this OTIP Grant Monitoring Tool (GMT) to fulfill the requirements of a desk review or site visit. The GMT is an internal document; **do not send** it to the grantee in advance, or following, the site visit.

You are required to obtain and review documentation that verifies program activities and expenditures while conducting a site visit. Documentation can consist of any hard copy or electronic documents, including invoices, policies and procedures, logs, timesheets, etc., that provide evidence that an activity or expenditure claimed by the grantee actually occurred. Use your judgment to decide what additional documentation is acceptable to confirm expenditures and program activities.

The length of a site visit varies based on many factors, including the number and complexity of awards being monitored, the nature of the program(s), and the risk level of the grantee. On average, most OTIP site visits can be completed between one to two days. You then have 30 calendar days from the end of the site visit to complete and submit the site visit report.

information is estimated to average 10 hours per grantee, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. This collection of information is required to retain a benefit (DVHT/TVAP: 22 U.S.C. § 7105, HTYPE: Pub. L. 115–425, NHTH: Section 107(b)(1)(B)(ii) of 22 U.S.C. § 7105]. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information subject to the requirements of the Paperwork Reduction Act of 1995, unless it displays a currently valid OMB control number. The OMB # is 0970-0558 and the expiration date is XX/XX/XXXX. If you have any comments on this collection of information, please contact Vera J. Kiefer, MPA, OTIP Research and Data Collection Analyst at Vera.Kiefer@acf.hhs.gov.

Section I. General Information

Site Visit Information: You can use one Grant Monitoring Tool (GMT) document per OTIP-funded grant being reviewed. **The Project Officer must complete this document; do not ask the grantee to fill out any information.**

Grantee:	Date(s) of Site Visit:
Project Officer:	Supervisor:

OTIP Award Information: List the OTIP grant being reviewed during this site visit.

Grant Number	Program	Project Period	Award Amount

Other Federal Trafficking Award Information: List each non-OTIP federal human trafficking-related grant the grantee is currently receiving.

Federal Funder	Program	Project Period	Award Amount

Subrecipient(s) Information (if applicable): List information for each subrecipient and/or subcontract under this grant.

Subrecipient Name	Program	Project Period	Award Amount Per Budget Period

Geographic Coverage of Project (include the state, and counties served):

Description of Grantee's Mission, General Work, and Agency-Wide Anti-Trafficking Initiatives:

Project Officers Notes/Concerns (e.g., grantee responsiveness, issues with timely submission of reports, potential red flags, etc.)

Section II. Site Visit Preparation

To maximize the value of the time spent on site with the grantee, you must plan ahead. Planning activities include conducting a desk review at least 60 days before and sending a Site Visit Notification Letter at least 30 days before the site visit.

> **Desk Review:** Project Officer evaluates the financial, administrative, and programmatic soundness of the grant, identifies any non-compliance or areas of concern to address with the grantee during the in-depth monitoring, and documents the anticipated amount of time needed to complete the site visit. You may also confer with federal funders or partners to identify any issues other grant monitors may have flagged.

> **Site Visit Notification Letter:** Project Officer must include a list of documents for the grantee to send, and/or prepare to view onsite, at least 30 days prior to the site visit. By reviewing these documents in advance, you can conduct a more thorough review during the site visit.

Information to Review in Preparation for the Site Visit:

In preparation for the site visit, you should review the following information (as applicable):

- Funding Opportunity Announcement
- Application/ Project Purpose
- Budget
- Budget Narrative
- Correspondence with the grantee
- Performance Progress Reports
- Federal Financial Reports (FFRs)
- Past programmatic monitoring
- Past financial monitoring
- Grant Amendments

The grantee should provide a copy of the project goals, objectives, and deliverables from the application and document activities/program implementation completed to date, to include a list of award related activities that have not been completed, if applicable. If there are significant changes to the project timeline, you should

request in writing updated deliverable dates and justification for the delay for the official grant file.

Further, if you have received any negative or positive feedback regarding the grantee's implementation of the project, this information should be noted for discussion with the grantee. If the grantee has received and been made aware of any negative feedback, you should review any documentation of corrective action taken by the grantee.

Site Visit Report

The site visit report will summarize the visit, document findings, and issue corresponding recommendations and/or corrective actions. The report must be issued to the grantee within 30 calendar days of the exit interview date.

>**Recommendation:** Issued for findings where the grantee could improve their performance, or would benefit from additional technical assistance. For example, a grantee has a challenging relationship with their subrecipient(s), and would benefit from strengthening its MOUs, and receiving technical assistance/training on subrecipient oversight.

>**Corrective Action:** Issued for findings related to noncompliance with terms and conditions of their OTIP grant. This includes failure to meet projected targets, complete project activities, expenditure of funds or conducting activities that are not in accordance with the grant's statutory authority, regulations, guidelines, or application. For example, a grantee uses domestic grant funds to serve foreign national survivors of human trafficking.

Section III. Entrance Interview

During the entrance interview, advise the grantee of the objectives of the site visit and the steps that you will take to complete these objectives. Explain that you are available to answer questions and provide technical assistance as needed. Inform the grantee that they will receive a report documenting any findings and/or corrective actions identified during the site visit. **Please note all findings and corrective actions should be discussed with the grantee during the Exit Interview.** Record the names and titles of those attending the entrance interview in the table below.

Participant Name	Title	Agency

Entrance Interview Notes
Date and Time:

Section IV. Financial Review

To complete the financial review, you must request a sample of the grantee's expenditures for the requested reporting period(s). In addition, you should follow up on any financial items identified during the desk review such as delinquent financial reports, unallowable expenditures, drawdown activity, cost sharing/match, and rate of expenditures. Use the following questions to guide your general financial review of the grant. If documentation is missing or you have concerns, note the award number and issue under "Financial Review Concerns," including issues that require further documentation. You must also document any findings in the site visit report.

1. Did the pre-site visit desk review identify any financial concerns that remain unresolved?

2. Can the grantee explain the process to behind the development of the FFRs?

3. Does the financial system report provided by the grantee raise any concerns?

4. Does the grantee maintain documents supporting detailed expenditures made within each award budget cost category?

5.   A) Does the award require a match? If yes, is the match:
     i.   Cash, or
     ii.   In-kind?

     B) If yes, does the grantee have supporting documents for the match expenditures?

6. Do grantee expenditures seem reasonable, allowable, and authorized?

Financial Review Notes

Financial Review Concerns

Section V. Administrative Review

You are required to conduct a compliance review of administrative requirements. You must also document any findings in the site visit report.

1. Are the grantee administrative processes sound and is all information current? The grantee's file should include the following items, at a minimum:
   a. Office policies and procedures
   b. Timesheets and position descriptions for all project staff (including staff no longer on the project)
   c. Financial records of project spending
   d. If applicable, proof of match
   e. Receipts for grant-related activities
   f. If applicable, oversight documentation for all subrecipients (e.g., MOUs, performance progress reports, financial reports, etc.)
   g. Most recent financial audit

    h. If applicable, documentation of fulfillment of staff anti-trafficking training requirements

2. Are key personnel, including subrecipient staff, performing duties as originally proposed?

3. Do timesheets show that the grantee is allocating staff time as outlined in the application, and only billing for allowable activities under the grant? What is the accounting code used for OTIP expenditures under this grant?

4. Obtain the following information for all key personnel, including subrecipient(s) Please note if there are any resumes you did not receive:

Name	Title	Agency	Percentage Designated to Grant

5. Does the program/budget indicate funds for a consultant? If yes, can the grantee produce evidence of the procurement process that they used to secure the services of a consultant?

6. Does the grantee have an established written policy requiring the agency to ensure that potential vendors/contractors have not been suspended or barred prior to awarding federal funds?

The following questions are specific to grantees with subrecipient(s):

1. Does the grantee have MOUs or other established, written procedures related to its subrecipient award process specifically related to the following areas: pre-award; post-award monitoring; and closeout?
    a. For OTIP grants that require Project Officer prior approval of MOUs, were all MOUs submitted and approved in advance?

2. Does the grantee have a risk assessment of all subawards in place for the current year?

3. Is there documentation to show that the grantee is conducting monitoring activities on their subrecipients?

4. Is the grantee maintaining subrecipient files with all applicable documents (e.g. signed MOUs, site visit reports, correspondence)?

5. How does the grantee monitor its subrecipient(s)?
    a. Has the grantee conducted a site visit to each of its subrecipient(s)?

6. Does the grantee provide technical assistance to its subrecipient(s), and if so, describe.

Administrative Review Notes

Administrative Review Concerns

Section VI. Programmatic Review

Programmatic monitoring includes reviewing the content and substance of the award program. It also involves a qualitative and quantitative review to determine

whether the award goals and objectives stated in the project description in the monitoring system of records, the original application, and any subsequent grant amendments are being implemented as planned and award activities are consistent with the award implementation plan. Programmatic monitoring also involves assessing technical assistance (TA) needs and assessing the implementation of projects and/or suggesting any necessary modifications.

In general, grantees should be able to provide documentation to support performance measurement data reported and for major activities conducted, such as training offered, that support the program's goals and objectives. When deciding which program activities require supporting documentation, you should prepare a list of the deliverables, performance measures, and major activities that the grantee is required to complete. On occasion, grants may contain a special condition requiring that the grantee fulfill a requirement, such as attending training.

If you discover that documentation is missing, please explain in "Programmatic Review Concerns". You must also document any findings in the site visit report.

1. A) Are you able to verify that the grantee has accurately described services and activities in progress reports?

    B) If yes, describe the evidence.

    C) If no, describe your concerns.

2. As a result of your observations or discussions with grantee, are you able to validate that project goals, objectives, and deliverables are being implemented as planned according to the approved timeline and budget? (Please note delays in implementation and reasons cited by grantee, including delays related to the COVID-19 pandemic.) For victim service grants this must include grantee's progress on the development of Victim Service Protocols, and a sustainability plan (if applicable).

3. Has anything come to your attention that raises doubts about the program's efforts to be trauma-informed, person-centered, linguistically appropriate, or culturally responsive?

4. Have all materials used during the project period been submitted to and approved by OTIP (e.g., outreach, training, public awareness materials, job descriptions, resumes, etc.)?

5. Did you observe or were you made aware of changes in planned grantee activities?

6. Is there evidence that the grantee files (e.g., client files, student assessments, etc.) are thorough and include all required documentation (e.g., screening tool, intake assessments, safety plans, individualized service plans, case notes, etc.)?

7. Can the grantee explain how their performance measurement data is collected like who provides the data, who collects it and how often, and where is it stored?

   i.   Is the data available in paper program files or electronic data systems, or databases external to the organization?
   ii.   Is the grantee using existing or specially designed databases/systems, spreadsheets, electronic or paper documents for OTIP reporting purposes?
   iii. Determine the source of the data. Does the grantee coordinate with other individuals or agencies to collect the data?
   iv.   How does the grantee use the data to inform their management of the program?
   v.   How long does grantee maintain the data and the systems used to safeguard the integrity of the data?
   vi.   Does the grantee maintain records to support performance measurement data submitted to OTIP?
   vii. Are you able to determine how the grantee ensures that data reported is accurate (this would include data reported by subrecipients)?
   viii. For grantees developing their own data collection plan, was the data collection tool approved by the Project Officer?

Programmatic Review Notes

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Programmatic Review Concerns

Section VI. Promising Practices of Success Stories

If the grantee successfully implemented a project(s) for possible transfer of knowledge to the field or other jurisdictions, please describe below. You should also inquire about any success stories the grantee would like to highlight, in particular, stories that are responsive to the current Administration's priorities.

Section X. Training and Technical Assistance (TTA) for Follow-Up

Questions to ask the grantee:

1. Did you receive training through the National Human Trafficking Training and Technical Assistance Center (NHTTAC)?
    a. Did you feel that NHTTAC was responsive to your TTA needs?
    b. Were the consultants' knowledge and expertise appropriate for your TTA needs?
    c. Is there anything that NHTTAC could have done differently or better?
2. As a result of receiving TTA, what do you plan to do?
3. Are there any significant challenges to performing these activities?
4. Are there any other topics that you would like to learn more about?
5. Has the shared platform provided by NHTTAC added any value to your program?

TTA Notes

Section XI. Exit Interview

To conclude the site visit, meet again with your POCs to discuss your findings from the visit. If you have identified findings or problems, you must bring these to the attention of the grantee and discuss ways in which they can resolve them. Advise the grantee that findings or problems identified during the site visit are subject to change after supervisory review, and/or based on additional information obtained subsequent to the site visit. All site visit findings, even if resolved immediately after the site visit, must be documented in the report. Also, remind the grantee that they will receive a site visit report, which will include a summary of the site visit and all findings identified during the visit, along with corresponding recommendations and corrective actions, if applicable. In addition, you should discuss any remaining needs for training/technical assistance to consider after the site visit. Record the names and titles of those attending the entrance conference in the chart below.

Participant Name	Title	Agency

Exit Interview Notes
Date/Time:

Site Visit Findings and Corresponding Recommendations and/or Corrective Actions