

# **10 FAM 230**

## **GRANTS MANAGEMENT**

*(TL:PEC-006; 03-28-2002)*

### **10 FAM 231 GRANT REVIEW GUIDELINES**

#### **10 FAM 231.1 General**

*(TL:PEC-006; 03-28-2002)*

a. The Bureau of Education and Cultural Affairs (the "Bureau") provides institutional grants and cooperative agreements to promote the long-term foreign policy objectives of the United States by promoting mutual understanding between the people of the United States and the people of foreign countries. Grants are not awarded for the purpose of promoting the short-term foreign policy goals of a particular administration. Consistent with the above, the Bureau seeks to be responsive to the needs and interests of the field posts and Fulbright Commissions and/or foundations as articulated in their annual country plans, as well as to the broad private sector constituencies in the United States engaged in international educational and cultural exchange.

b. The Bureau's broad range of activities suggests the need for flexible guidelines addressing its various program categories. Although application guidelines and review procedures may vary depending on type of program, the following comprises a general Bureau structure for application and review for grants and cooperative agreements, as well as amendments, which add funds. Additional specific procedures for each office and for special competitions and special programs and program categories, developed in consultation with the Assistant Secretary, must be consistent with these guidelines.

#### **10 FAM 231.2 Eligibility**

*(TL:PEC-006; 03-28-2002)*

a. Academic and cultural institutions, exchange-of-persons and other not-for-profit organizations are eligible to apply for grant support. Grant activities must be consistent with and authorized by the Mutual Educational and Cultural Exchange Act of 1961, as amended (Pub. L. 87-256, September 21, 1961, the "Fulbright-Hays Act"), and must comply with the Bureau's legislative charter, which states:

"The President, or his designee, shall insure that all programs under the authority of the Bureau shall maintain their non-political character and shall be balanced and representative of the diversity of U.S. political, social and

cultural life. The President, or his designee, shall insure that academic and cultural programs under the authority of the Bureau shall maintain their scholarly integrity and shall meet the highest standards of academic excellence or artistic achievement.”

b. Organizations should demonstrate a proven record (at least four years) of successful implementation of international exchange, including responsible fiscal management and full compliance with all reporting requirements. Pilot grants not to exceed \$60,000 (total Department funding) may be awarded to otherwise eligible organizations with less experience in international exchange.

c. All programs and projects should conform to other applicable Bureau of Education and Cultural Affairs guidelines, as well as applicable legal, reporting, and compliance requirements, and are subject to the requirements of the grants officer. Agreements between the Bureau and U.S. organizations must be signed and executed by representatives of both entities and funds obligated by the Bureau before U.S. organizations can start proposed activities.

d. The Bureau seeks to promote competition and balance in its discretionary grant making and strives to avoid exclusivity. Programs will be evaluated by the Bureau and, on occasion, by independent outside experts.

### **10 FAM 231.3 Application Review Procedures**

*(TL:PEC-006; 03-28-2002)*

Basic grants and cooperative agreements to long-term, traditional agencies implementing basic exchange programs (identified jointly by the Bureau program office and the Office of the Assistant Secretary, consistent with guidance provided by the Office of the Assistant Secretary) are solicited and reviewed annually. They are reviewed according to criteria developed by the program, budget, and grants offices, and the Office of the Assistant Secretary, in consultation with the relevant regional bureau as necessary. The responsible Bureau program office and the Office of the Assistant Secretary jointly identify grants and cooperative agreements falling into this category.

### **10 FAM 231.4 Grants Programs**

*(TL:PEC-006; 03-28-2002)*

For these programs, the program office and the Office of the Assistant Secretary develop specific application and proposal guidelines. Each complete application includes:

(1) A standard Bureau cover sheet, other required federal forms provided in the Proposal Submission Instructions (PSI) application package

(e.g., "drug-free workplace," debarment, "lobbying" certification (if applicable) and Equal Employment Opportunity (EEO) compliance forms);

(2) A copy of the organization's charter;

(3) A narrative proposal describing in detail the need for the program, its objectives, proposed participants, selection criteria, proposed activities, itineraries, follow-up, and plan for assessment of project; for solicited projects, issues to be addressed in the proposal should be provided by the program office in its application guidance;

(4) A detailed budget, complying with the requirements of the Bureau's Executive office and the grants officer, including specification of cost-sharing and in-kind contributions as appropriate;

(5) Curriculum vitae of project staff;

(6) Germane letters of endorsement; and

(7) The organization's most current Certified Public Accountant (CPA.) financial statement (one per institution per year).

## **10 FAM 231.5 Competition Requirements**

*(TL:PEC-006; 03-28-2002)*

a. Competitions are announced through Requests for Grant Proposals (RFGPs) published in the Federal Register, and by invitation to selected institutions when highly specialized expertise is required. Consistent with these guidelines, each program office develops and revises, as necessary, specific guidance for its general and special competitions, including detailed descriptions of solicited programs and clear criteria for the assessment of proposals by Bureau panels and, on occasion and in addition, by expert, outside reviewers. For highly specialized competitions, independent outside peer panels may be convened. Criteria should, in all cases be consistent with established Bureau standards and cognizant authorities. (See 10 FAM 232 below for general Bureau criteria.)

b. Before requesting proposals from outside agencies or issuing RFGPs, program offices should:

(1) Prepare a draft approval memorandum containing a brief description of the proposed activity, project, and program, list of U.S. organizations to be solicited, rationale for selecting proposed institutions, and a draft solicitation letter or RFGP;

(2) Clear drafts of the RFGP and solicitation letters with ECA-IIP/EX/PM, ECA-IIP/EX/G, and, as appropriate, with regional bureaus, and L;

(3) Once the above drafts have been cleared by the appropriate elements, incorporate edits and prepare a final solicitation package for the Assistant Secretary's review and approval. Packages are forwarded through ECA-IIP/EX/PM, who reviews them with the Assistant Secretary; and

(4) After approval of the solicitation package by the Assistant Secretary, an RFGP is published in the Federal Register by ECA-IIP/EX/PM or the program office mails solicitation letters to potential applicants listed in the approval memorandum. Once an RFGP is published or a solicitation has been issued, the program office holds discussions with potential applicants concerning Bureau application procedures.

## **10 FAM 231.6 Internal Review Procedures**

### **10 FAM 231.6-1 Timing**

*(TL:PEC-006; 03-28-2002)*

Program offices should generally allow approximately eight weeks from formal receipt of complete proposal packages for the analysis, review, decision and award process.

### **10 FAM 231.6-2 Staff Contact**

*(TL:PEC-006; 03-28-2002)*

Following the application deadline, there will be no substantive staff comment or discussion with the applicant concerning the content of the proposal or the internal Bureau assessment. Following the Assistant Secretary's decision, and with ECA-IIP/EX/G clearance for grant and/or cooperative agreement approvals, the applicant will be notified, in writing, of the outcome. For disapprovals, ECA-IIP/EX/G clearance is not required.

**NOTE:** The requirements stated in this section do not preclude discussion of technical requirements or the various required compliance forms either before or after the application deadline, as necessary. They do not apply to negotiations of grants or cooperative agreements for traditional, long-term programs.

### **10 FAM 231.6-3 Procedures for Processing Proposals**

*(TL:PEC-006; 03-28-2002)*

a. Upon receipt, each proposal for a grant, cooperative agreement or amendment will be entered by ECA-IIP/EX/PM into the Bureau's electronic tracking system. Once the proposal is assigned a number by ECA-IIP/EX/PM, the responsible program office will provide continuous updating as internal reviews and clearances are submitted and completed.

b. The program office will:

(1) Review each proposal for completeness and technical eligibility and ensure that each eligible proposal is assigned an action officer. (Generally, incomplete or technically ineligible proposals will not be considered further. ECA-IIP/EX/PM is ultimately responsible for determining technical eligibility.);

(2) Ensure that each complete proposal is reviewed by an advisory panel (see 10 FAM 231.7, below) based upon the review criteria stated in the solicitation document;

(3) Ensure that each complete proposal is acknowledged by a letter to the applicant; and

(4) Work with ECA-IIP/EX/PM to establish a panel date if the proposal is eligible for further review.

c. The panel's formal recommendations or conditions for clarification or additional information related to a proposal must be communicated by the program office, in writing, to the applicant and addressed by the applicant in writing before the Assistant Secretary can make a final funding decision.

d. For ineligible proposals, a letter to the applicant stating the reason for ineligibility should be prepared for the appropriate Office Director's or Deputy Assistant Secretary 's signature.

## **10 FAM 231.6-4 Program Office Responsibilities**

*(TL:PEC-006; 03-28-2002)*

The program office forwarding a proposal for panel review should:

(1) Certify that all application elements have been received;

(2) Distribute the proposal cover sheet to ECA-IIP/EX/PM in all cases; distribute complete proposals to panelists; and, as necessary, distribute the complete proposal to regional bureaus and to the relevant Public Affairs Sections at U.S. Embassies; in rare instances, proposals might also be shared with the Office of the Legal Adviser, and the grants office for preliminary review;

(3) Include for panel review relevant internal and external assessments and evaluation studies, and the solicitation (including review criteria) to which the proposal responds;

(4) Be consistent with the Bureau policy statement on program officer responsibilities for the panel and prepare staff analysis of proposals (written comments on apparent "strengths" and "weaknesses) based on general Bureau and specific review criteria as stated in the solicitation document; and

(5) Forward copies of the solicitation, the proposal, comments of other elements, office analysis and blank voting sheets to panel members and a copy of the solicitation, office analysis and a blank voting sheet to ECA-IIP/EX/PM at least one week prior to scheduled panel meeting.

## **10 FAM 231.6-5 Exceptions**

*(TL:PEC-006; 03-28-2002)*

The Assistant Secretary must approve exceptions to the internal review requirements in writing. Project proposals must, in all cases, comply with all applicable Office of Management and Budget (OMB) and other legal requirements (including contractual requirements) prior to funding.

## **10 FAM 231.7 Advisory Panels**

*(TL:PEC-006; 03-28-2002)*

a. Each technically eligible proposal shall be reviewed by an advisory panel of which a majority of the voting members shall be career employees from other than the grant-making office or geographic bureau corresponding to the project's location or benefiting from the project.

b. Panels:

(1) Are scheduled by the program office in consultation with the Bureau Grants Coordinator (ECA-IIP/EX/PM);

(2) Include non-voting representatives of the Bureau program office, relevant regional/geographic/functional bureaus, budget, grants and Legal Adviser's offices (if applicable); and

(3) Are chaired by the ECA-IIP/EX/PM or designated alternate.

## **10 FAM 231.7-1 Minutes of Panel Meetings**

*(TL:PEC-006; 03-28-2002)*

Minutes, taken by program office staff, should provide a report on the substance of the discussion, and recommendations relating to each proposal. Participants, voting and non-voting, should be listed on the introductory page. In the text, individual participants should not be directly identified with their remarks. Instead, the discussion section should identify panelists as "Panelist A" or "The first panelist".

## **10 FAM 231.7-2 Senior Management Panels**

*(TL:PEC-006; 03-28-2002)*

In addition to grant review panels described in preceding sections, the Bureau Grants Coordinator and Bureau Principal Deputy Assistant Secretary, in consultation with the Assistant Secretary, designate, consistent with the above standards, a pool of "senior management panelists" of senior officers familiar with long-term Bureau programs. These panelists are called upon to review administrative budget actions for traditional, long-term programs, and, on occasion, other elements of the proposal. In addition, senior management panels may be convened by ECA-IIP/EX/PM, at the request of the program office to review proposals for exceptional actions such as Congressional "earmarks," renewal grants or special initiatives.

## **10 FAM 231.7-3 Other Panels**

*(TL:PEC-006; 03-28-2002)*

Special outside panels, including experts in areas relevant to the competition, selected consistent with Bureau charter requirements, may, with approval of the Office of the Assistant Secretary, be convened for discrete, specialized competitions. Procedures for the overall review must be consistent with the Bureau's grant review guidelines.

## **10 FAM 231.7-4 Panel Responsibilities**

*(TL:PEC-006; 03-28-2002)*

a. Each panel member:

(1) Comments on quality of grant requests with specific reference to consistency with established standards and criteria (general Bureau criteria, below, and specific office criteria and/or criteria for the specific competition), and the Bureau's legislative mandate;

(2) Submits a written voting sheet for each proposal; and

(3) Recommends approval and/or disapproval, additional staff work, possibly including modest, feasible "conditions" and/or modifications such as additional outside review of the application.

b. At the conclusion of panel consideration of each proposal, the Bureau Grants Coordinator summarizes for the minutes follow-up actions for various elements, including recommendations or conditions that may request additional expert outside review.

## **10 FAM 231.7-5 Program Office Responsibilities Following Panel Review**

*(TL:PEC-006; 03-28-2002)*

Following panel review:

(1) The program office coordinates follow-up actions of various elements and prepares a package for the Assistant Secretary requesting concurrence with the panel and/or office recommendations;

(2) The program office following Assistant Secretary's approval of the concurrence package authorization, contacts the applicant for responses to panel questions, if any;

**NOTE:** Such contacts must emphasize that no decision has been made, and should provide no information about the status or substance of the review.

(3) The program office summarizes for the file the institution's response to panel questions;

(4) The program office prepares the final grant package file for Assistant Secretary with the Congressional Notification memorandum, memorandum to the ECA-IIP/EX/G (Grants Division) including specific reporting requirements, copies of proposal (including required compliance forms), panel review voting sheets, minutes of panel meetings, Regional/Geographic Bureaus' comments and comments from the Public Affairs sections at U.S. embassies abroad that will be involved in the activity, request for outside review (if applicable) and, for proposals recommended for "approval" by either the panel or the program office, statement of applicant's response to questions and budget review. In rare instances, as necessary, comments from the Office of the Legal Adviser and Bureau Budget Office may be requested and included in the package;

(5) The program office forwards grant file to Assistant Secretary through ECA-IIP/EX/PM (Bureau Grants Coordinator); and

(6) The Assistant Secretary may approve special procedures for large competitions.

## **10 FAM 231.8 Certification and Decision**

*(TL:PEC-006; 03-28-2002)*

a. The Program Management Staff (ECA-IIP/EX/PM) in the Office of the Executive Director are responsible for the following actions on each proposal:

(1) Inputting initial information into the Bureau's database about each proposal received in response to a solicitation;

(2) Certifying that the solicitation process and the review of the proposal is consistent with procedural requirements set out in the Bureau's Congressionally mandated and approved grant guidelines;

(3) Forwarding the concurrence package or final grant package to the Assistant Secretary or to Principal Deputy Assistant Secretary (PDAS) for approval and/or disapproval. The Assistant Secretary or PDAS may request additional, expert, outside review, coordinated by the Bureau Grants Coordinator in consultation with the respective Office Director. For decisions contrary to the advisory panel recommendation, the Assistant Secretary notes for the file the rationale for the decision;

(4) Sending a copy of the signed concurrence memo and the signed Congressional notification to program office;

(5) Submitting a Congressional notification to cognizant Congressional Committees for the 15-day notification period. For ECA/PE/V group projects notification is submitted annually prior to the beginning of each fiscal year for regional and multi-regional projects projected for that year;

(6) Forwarding the approved grant file to ECA-IIP/EX/RM/ECE for final processing and conveyance to ECA-IIP/EX/G; and

(7) Issuing "release of funds" memo to EX/G upon expiration of the 15-day notification period.

b. Following the Assistant Secretary's written decision, applicants whose proposals were not funded should be informed, in writing, by the program office. For approved grant requests, office directors may send their own letters to applicants in addition to those of the ECA-IIP/EX/G grants officer. Final authority to make grants and cooperative agreements, including all amendments, resides with the ECA-IIP/EX/G grants officer.

## **10 FAM 231.9 Special Program-Specific Review Procedures**

### **10 FAM 231.9-1 Cultural Programs, Office of Citizen Exchanges (ECA/PE/C)**

*(TL:PEC-006; 03-28-2002)*

A/LM/AQM/CM contracting officer awards certain agreements in support of visual and performing arts activities of the Office of Citizen Exchanges, rather than an ECA-IIP/EX/G grants officers. Such agreements are not subject to Bureau-wide grant guidelines and procedures. These agreements are subject to the general requirements of the contracting officer, and must include all legally required forms, compliances etc. Following negotiation with relevant posts concerning dates, itinerary, etc., the specific terms of a final agreement are documented in a contract. Program staff prepares the final file for the Assistant Secretary and the necessary documents for the contracting officer. Following the Assistant Secretary's final approval, the contracting officer awards the agreement.

**Note:** Grants and cooperative agreements involving a ECA-IIP/EX/G grants officer must adhere to all Bureau-wide grant guidelines and procedures.

### **10 FAM 231.9-2 International Visitor Grants Administrative Process for Multi-Regional and Regional Projects (Group Projects)**

*(TL:PEC-006; 03-28-2002)*

a. Multi-regional and regional project themes are developed in response to Department goals and themes and to mission performance plans submitted by each U.S. embassy abroad. When the Office of International Visitors finalizes the annual list of project themes, it is sent to the Bureau Grants Coordinator to forward for Congressional notification, and the office files are started for each project theme. The Office of International Visitors either assigns regional and multi-regional group projects to National Program Agencies (NPAs) or competes them among NPAs.

b. Project concept papers are written by the Office of International Visitors in support of each project theme. Concept papers contain the following:

- (1) Project titles and dates;
- (2) Communication goals;
- (3) Types of participants desired; and

(4) Summary of program objectives.

c. Project concept papers are reviewed by the program office, the functional and geographic bureaus and made available to all missions, national program agencies and local sponsors. NPAs are required to submit a proposal complying with the guidelines contained in the project concept paper and specific instructions from the program office with regard to competitive projects.

d. Assigned proposals are submitted directly to ECA/PE/V Program Officers; competed proposals are submitted to the Group Projects Division, Office of International Visitors, and then are distributed to the relevant Program Officers.

e. Proposals are reviewed for both substantive content and budget by program staff to screen for compliance with program guidelines and to identify errors in budget computations or other inconsistencies.

f. ECA/PE/V Program Officer prepares an analysis of proposal(s) for review by three DOS colleagues not directly connected with the IV program, but who have foreign affairs experience and may have specific expertise on a particular topic. The analysis memo contains a review of the proposal based on adherence to concept paper guidelines, methodology, creativity, balance and other charter requirements, geographic diversity, institutions' past performance and budget.

g. DOS colleagues review the proposals based on adherence to project concept paper guidelines and criteria checklist instructions.

h. Suggestions and recommendations from the proposal reviewers are distributed to the national program agency program officer for information and/or implementation.

i. Following approval, conditions and/or modifications are worked out with the institution.

j. Files on projects that will result in new grants or amendments to existing grants are sent to the Bureau Grants Coordinator and Grants Division for final processing; progress of grant package is tracked.

k. At conclusion of regional or multi-regional projects, a substantive report is written by the English Language Officer(s) or Interpreter(s), national program agency and ECA/PE/V program officer evaluating the program. Recommendations for future projects should be part of the report.

i. Evaluation reports are sent to participating posts and are distributed to national program agency program officers.

# **10 FAM 232 GRANT REVIEW CRITERIA**

## **10 FAM 232.1 General**

*(TL:PEC-006; 03-28-2002)*

All Bureau solicitations (RFGPs, limited, renewal, sole source, or amendment requests) must include the review criteria that will be used to evaluate each proposal. Diversity and project evaluation are mandatory for all solicitations. Innovation and productivity is mandatory for renewal solicitations or sole sources that are solicited more than once. Additional review criteria and guidelines are available for each Bureau Program Office and for specialized programs. (The list presented below is not exhaustive and can be modified and/or adapted as the program office sees fit.) Grant recipients should have an established reputation for excellence in the field in which the grant is being awarded. In certain cases, grants may be awarded based on the demonstrated potential for excellence for the proposed program or project. The program or project should be representative of current expert knowledge in the field, and should be consistent with the requirements of the Bureau's legislative charter, meeting the highest professional standards of achievement.

## **10 FAM 232.2 Mandatory Criteria**

*(TL:PEC-006; 03-28-2002)*

### **a. Support of Diversity**

Proposals should demonstrate substantive support of the Bureau's policy on diversity by outlining relevant aspects of the institutional profile of each participating institution together with the relevancy of issues of diversity as applied to program objectives and implementation.

### **b. Project Evaluation**

Proposals should include a plan to evaluate the activity's success, both as the activities unfold and at the end of the program. A draft survey questionnaire or other technique plus description of a methodology to use to link outcomes to original project objectives should be included in each proposal.

### **c. Productivity and Innovation**

For grants and cooperative agreements to long-term, traditional program agencies or to organizations submitting a renewal application in response to a renewal solicitation, each year's application must specify and verify the prospect of improved productivity, and proposed program innovations.

## **10 FAM 232.3 Additional Review Criteria**

*(TL:PEC-006; 03-28-2002)*

### **a. Value to U.S.-Partner Country Relations**

Proposals should be assessed by the Department's geographic country desks to evaluate the need for the program or project and its potential impact and significance in the partner country and/or countries.

### **b. Multiplier Effect**

Proposed programs and projects should serve to strengthen long-term mutual understanding between the United States and a partner country by evidencing a potential "multiplier effect" of continuing professional contact and development.

### **c. Institutional Capacity**

Proposed personnel and institutional resources should be adequate and appropriate to achieve the program or project's goals. Careful planning and follow-up, including program evaluation, should be demonstrated in the proposal submission.

### **d. Track Record in Conducting Past Exchanges**

Proposals should include an honest discussion of the organization's experience in conducting previous exchange programs and the inclusion of relevant internal or external evaluations of past programs.

### **e. Cost-Effectiveness**

The overhead and administrative components of grants, as well as salaries and honoraria, should be in compliance with Bureau guidelines and all U.S. Government regulations. All budget items should be necessary and appropriate. Cost-sharing and in-kind contributions should be encouraged.

### **f. Cost-Sharing**

Proposals should maximize cost sharing through other private sector support as well as institutional direct funding contributions.

### **g. Follow-on Activities**

Proposals should provide a plan for continued follow-on activity (without Bureau support) ensuring that Bureau supported programs are not isolated events.

# **10 FAM 233 GUIDELINES FOR CONFERENCES**

## **10 FAM 233.1 Applicability**

*(TL:PEC-006; 03-28-2002)*

The guidelines in this subchapter apply to programs within the Bureau of Education and Cultural Affairs in which more than one-third of the specific project is devoted to a conference or seminar activities. They apply to focused programs of 14 days or less duration in one location.

## **10 FAM 233.2 Allowable Expenses**

### **10 FAM 233.2.1 Current Issues**

*(TL:PEC-006; 03-28-2002)*

Conferences and seminars on current political and economic issues (those being defined in standard dictionary terms) will be funded only to the extent of travel and per diem plus, where necessary administrative expenses of not more than 10% of Department- financed travel and per diem.

### **10 FAM 233.2-2 Other Topics**

*(TL:PEC-006; 03-28-2002)*

Other conferences and seminars will be funded primarily to the extent of travel and per diem plus, where necessary, administrative expenses of not more than 20% of Department-financed travel and per diem. When compelling reasons indicate the need for an exception to this guideline, the Department will discuss the need with the relevant Congressional committees in advance of Congressional notification.

## **10 FAM 233.3 Enhancement Component**

*(TL:PEC-006; 03-28-2002)*

Exchange participants at conferences and seminars in the United States will, to the extent possible, and subject to the availability of funds, in addition to participation in the conference or seminar, have an additional exchange experience added to their visit. This enhancement is intended to provide at modest additional cost an additional perspective on life in the United States supplementing the specific subject matter discussed at the conference.

# **10 FAM 234 PROGRAM OFFICER GUIDELINES FOR ANALYSIS OF ADVISORY REVIEW PANEL REPORTS**

## **10 FAM 234.1 Basis**

*(TL:PEC-006; 03-28-2002)*

For each project proposal received in response to a solicitation issued by the Bureau, an assigned program officer must prepare a written analysis of the proposal package prepared by the applicant in terms of established, publicly available Bureau and general office criteria, and specific competition criteria, as set out in the RFGP. The program officer's written analysis should address the objectives set forth below in this subchapter and should be presented to the Advisory Review Panel for consideration in preparing the panel evaluation.

## **10 FAM 234.2 Focus**

*(TL:PEC-006; 03-28-2002)*

Written analysis by the assigned program officer should address the proposed project's strengths and weaknesses in terms of general Bureau criteria and the specific, written criteria established for the competition.

## **10 FAM 234.3 Organization**

*(TL:PEC-006; 03-28-2002)*

Analysis should address each specific criterion separately, and should reference the relevant element of the proposal.

## **10 FAM 234.4 Budget Review**

*(TL:PEC-006; 03-28-2002)*

The proposed budget should be reviewed for cost-effectiveness in terms of the program's goals and for consistency with Bureau and Department standards and program needs as outlined in the solicitation.

## **10 FAM 234.5 Track Record**

*(TL:PEC-006; 03-28-2002)*

a. For applicant institutions which have received past grants or cooperative agreements from the reviewing office, the assigned program officer's analysis must include information on past performance, based on

standard office program monitoring, and feedback from posts abroad, if available.

b. The analysis should also include any information available from external evaluations or assessments. This information should be presented in terms of established, publicly available Bureau and office criteria, and specific goals of the completed activity.

## **10 FAM 234.6 Fairness**

*(TL:PEC-006; 03-28-2002)*

Program officers should strive for fairness and even-handedness in the entire review process.

## **10 FAM 235 BUDGET REVIEW**

*(TL:PEC-006; 03-28-2002)*

Prior to submitting the grant and/or cooperative agreement file to the Assistant Secretary for approval, the program office performs an initial review of the applicant's proposed budget. (The final grant budget, which is negotiated by the grants officer in consultation with the program office and the applicant must comply with all applicable OMB circulars and Department guidelines.)

### **10 FAM 235.3 Budget Preparation**

*(TL:PEC-006; 03-28-2002)*

a. The applicant institution's budget proposal should be divided into administration and program.

b. Detailed staff requirements need to be part of the budget submission, i.e., number of positions, title and salary levels, benefits, etc.

c. The proposal should address how the staff needs compare with similar organizations handling a similar workload. How were staff needs established? Functions and responsibilities of the staff for the proposed project must be clearly spelled out, including percentage of time charged to grant, etc.

d. Major cost categories should be broken down in detail. If there has been a prior year grant, the previous year's budget should be included for comparison. Any significant increases over the previous year's level must be explained.

e. All budget items should describe fully the purpose of the item and what it is producing.

f. If the proposed budget includes funding from other sources or cost-shared items, the applicant should make sure the budget is broken down to reflect all sources of funding and clearly indicate those line items that the Bureau is being asked to fund.

g. Organizations must abide by the requirements of the International Air Transportation Fair Competitive Practices Act of 1974 (Pub. L. 93-624, January 3, 1975), as amended (Pub. L. 96-192, February 15, 1980), (the "Fly America Act"), which generally requires the use of U.S. flag carriers. Proposed exceptions to this requirement must conform to that statute, as described in Department guidance on allowable exceptions, and are subject to prior approval via authorized channels.

h. Grant expenses may not be incurred prior to the effective date of the grant agreement. Any expenses outside the approved budget require prior written approval of the ECA-IIP/EX/G grants officer.

i. Expired grants may not be reopened and amended without the approval of the Assistant Secretary and the grant officer.

j. Uniform Travel Regulations (UTR), including requirements for using contract carriers, for complying with the Fly America Act, and those setting per diem or subsistence limits in the United States apply to all Bureau grants.

k. Other costs will be assessed for reasonableness by comparing them to costs in other grant proposals for similar projects.

## **10 FAM 235.4 Processing of Approved Proposals**

*(TL:PEC-006; 03-28-2002)*

a. After Assistant Secretary approval, the Bureau Grants Coordinator/Assistant (ECA-IIP/EX/PM) forwards the completed file to ECA-IIP/EX/RM/ECE and sends a copy of the signed Congressional notification to cognizant Congressional committee staff.

b. ECA-IIP/EX/RM/ECE authorizes obligation of funds and forwards the grant package to the Grants Division.

c. After the conclusion of the Congressional notification period (which may be extended by the Assistant Secretary if there are pending Congressional questions), ECA-IIP/EX/PM forwards the "funds release memo" and a copy of the "vetting" memo, signed by Bureau Grants Coordinator, to ECA-IIP/EX/G (Grants Division), confirming funds may be released.

# **10 FAM 236 MONITORING THE PROGRAM**

*(TL:PEC-006; 03-28-2002)*

a. 10 FAM 236 and 237 comprise general Program and Grant Monitoring guidelines for the Bureau after grants and/or cooperative agreements have been written in support of exchange programs. While the same general principles of accountability and oversight apply, the focus of the activities is, for some Bureau offices or divisions, different. Program monitoring provides management and oversight to Bureau-identified categories of activity, and generally includes activities funded under a number of grants and/or cooperative agreements. Grant monitoring provides management and oversight of discrete fiscal instruments to outside cooperating institutions and grantee institutions.

b. The general purpose of this subchapter is to improve the quality of program monitoring in the Bureau of Education and Cultural Affairs through the establishment of standards for monitoring. These standards provide a common framework for all program offices to follow and represent minimum expectations. Program offices are encouraged to exceed these standards whenever possible, and to delineate additional, program-specific standards, as necessary.

## **10 FAM 236.1 General Policy**

*(TL:PEC-006; 03-28-2002)*

The Bureau monitors the status and effectiveness of programs to provide reasonable assurance that federal funds are expended in ways that meet provisions of pertinent statutes, regulations and administrative requirements, and adequate progress is being made toward achieving program goals.

## **10 FAM 236.2 Applicability**

*(TL:PEC-006; 03-28-2002)*

All offices, which administer programs for the Bureau, are subject to the terms of these guidelines. Exemption from any provision may be requested with justifications by the cognizant Office Director and must be approved in writing by the Assistant Secretary or the Principal Deputy Assistant Secretary.

## **10 FAM 236.3 Activities**

### **10 FAM 236.3-1 Monitoring**

*(TL:PEC-006; 03-28-2002)*

a. Monitoring is the observation of, analysis of, or assistance to a program to determine and improve:

(1) Compliance with statutes, regulations, and terms and conditions of award; and

(2) Quality and the accomplishment of stated goals and objectives of the program.

b. Each program office is responsible for developing a plan, which delineates, how, in a given fiscal year, programs are to be monitored in accordance with the requirements set forth in this subchapter.

### **10 FAM 236.3-2 Authorization**

*(TL:PEC-006; 03-28-2002)*

Program activities must be consistent with and authorized by the Fulbright-Hays Act and must comply with the Bureau of Educational and Cultural Affairs' legislative charter.

## **10 FAM 236.4 Roles and Responsibilities**

### **10 FAM 236.4-1 Office Directors**

*(TL:PEC-006; 03-28-2002)*

Consistent with general responsibilities, Office Directors:

(1) Set guidelines for review and approve program-monitoring guidelines;

(2) Assure that program-monitoring functions are included in program officers' performance standards, as appropriate;

(3) Identify resources to be used by the program office for monitoring in conjunction with development of travel and other budgets; and

(4) Delineate monitoring responsibilities of managers and supervisors within the office.

## **10 FAM 236.4-2 Managers, Program Officers**

*(TL:PEC-006; 03-28-2002)*

Under the general supervision of the Office Director, managers and program officers:

- (1) Develop program-monitoring plans;
- (2) Develop appropriate and systematic monitoring approaches, guidelines, and instruments;
- (3) Maintain office grant files;
- (4) Monitor programs in accordance with monitoring plans and procedures, with assistance from the Grants Division on business and financial matters;
- (5) Advise program constituents on program progress; resolve problems or participate in the resolution of problems;
- (6) Establish internal procedures for tracking follow-up actions resulting from monitoring;
- (7) Review all programmatic reports concerning monitoring or which provide helpful input in the monitoring process, including any which contain recommendations to cooperating organizations and other Department offices concerned;
- (8) Review pertinent audit reports for monitoring implications in conjunction with the audit officers; and
- (9) Share documents and information with Bureau and or other Department elements, as appropriate.

## **10 FAM 236.4-3 Grants Division Staff Responsibilities**

*(TL:PEC-006; 03-28-2002)*

Consistent with its general responsibilities, the Grants Division Staff:

- (1) Share documents and information with program staff as necessary or helpful to program monitoring;
- (2) Maintain official grant files, if applicable;
- (3) In consultation with cognizant program staff, approve changes in scopes of activity negotiated between grantee organizations and Bureau Program Offices as monitoring results dictate;

(4) Monitor financial or business management aspects of programs;  
and

(5) Assist in developing financial management aspects of annual monitoring plans and guidelines.

#### **10 FAM 236.4.4 Role of the Inspector General**

*(TL:PEC-006; 03-28-2002)*

Consistent with its general responsibilities, the Inspector General:

(1) Assures appropriate handling and resolution of allegations of fraud, waste, and mismanagement disclosed through program monitoring; and

(2) Informs program offices of audit schedules and findings, as appropriate, to assist program offices in developing annual monitoring plans.

#### **10 FAM 236.4.5 Role of the Office of Legal Adviser**

*(TL:PEC-006; 03-28-2002)*

Consistent with its general responsibilities, the Office of the Legal Adviser:

(1) Provides assistance to program offices, as necessary, concerning legal issues raised in program monitoring guidelines, monitoring instruments, monitoring contacts, and monitoring findings; and

(2) Reviews for legal sufficiency and compliance with statutorily required procedures program guidelines and instruments that may interpret or apply statutes and regulations.

#### **10 FAM 236.5 Purpose of Monitoring**

*(TL:PEC-006; 03-28-2002)*

a. The purpose of program monitoring is to determine and improve compliance with statutes, regulations, and terms and conditions of any awards; and project quality and progress of a programs in meeting their stated Bureau goals in accordance with the terms and conditions set for them by the Bureau or other Department elements.

b. More specifically, sufficient and systematic monitoring of programs is needed to make the following administrative determinations:

(1) Compliance of grantees with award conditions, program regulations, and the authorizing program legislation;

(2) Sufficiency of progress toward accomplishing stipulated and approved project and program goals;

(3) Relative quality and cost effectiveness of the management of projects and programs;

(4) Need for technical assistance to enhance project quality and compliance;

(5) Identification and dissemination of exemplary results; and

(6) Communication with field posts of information relevant to their responsibilities.

## **10 FAM 236.6 Timing and/or Planning of Monitoring**

### **10 FAM 236.6.1 Application Period**

*(TL:PEC-006; 03-28-2002)*

The period for monitoring spans the time from the day of the grant award to the final day of the grant, including planning, recruitment, advertising and implementation of the program. At a minimum, all program activities must be monitored by written evaluations, e-mail or telephone during the grant period, at least once a year for long-term activities. Every grantee institution is required to submit a written final report. All program reports should include information about program activities and the achievements of individual participants.

### **10 FAM 236.6-2 Monitoring Plan**

*(TL:PEC-006; 03-28-2002)*

Each program office should submit a plan for monitoring grant programs. The plan is designed to ensure that each program office develops monitoring activities that are consistent with statutory and office requirements and purposes. It should contain the following elements:

(1) A summary of the monitoring activities to be carried out based on anticipated programs and resources. This summary should include an explanation of how monitoring priorities and methods were determined and an assurance that available data on programs have been considered in formulating the plan, and will be obtainable. The summary should provide information on the frequency, quantity, and purposes of monitoring being used, as well as who is to do the monitoring, i.e., staff or cooperating agencies;

(2) Justification should be made for monitoring that involves use of travel funds. Trips should be ranked in priority order with proper justification. Criteria that may be used in selecting programs for on-site monitoring appear below. In using these criteria, program managers should decide which criteria are most relevant to their program mandate(s) and rank programs recommended for visits in priority order with appropriate justification;

(3) A report of the progress made by grantee organizations in carrying out Bureau funded activities;

(4) An analysis of any particular problems or opportunities relative to on-going programs that will require special attention and a description of relevant monitoring and assistance activities;

(5) An explanation of anticipated Bureau monitoring costs for the fiscal year, including travel and staffing; and

(6) A copy of any program guidelines and instruments being used in the monitoring process or a timetable indicating when they will be ready for review.

## **10 FAM 236.7 Monitoring Approaches and Activities**

*(TL:PEC-006; 03-28-2002)*

All program offices should establish and maintain monitoring activities that are consistent with the statutory requirements and purposes of their authorizing legislation. These activities must include, at a minimum, systematic and appropriate contact with grantees, development of clearly understood operational guidelines and procedures for staff, and, when appropriate, other activities that enhance the effectiveness of grantees' progress in meeting program goals.

### **10 FAM 236.7-1 Monitoring Methods**

*(TL:PEC-006; 03-28-2002)*

a. At least five methods can be used for monitoring:

(1) Telephone conversations with grantees;

(2) Site visits;

(3) Review of reports prepared by grantees (Offices should ensure that all grants are subject to a reasonable level of monitoring, in light of resource constraints. At a minimum, all grantees must be monitored by review of written program reports prepared by all grantees each year. Complex or vulnerable grants, or projects with special significance, however, will require additional monitoring attention);

(4) Meetings with grantees; and

(5) Correspondence (written and/or electronic) with grantees.

b. Any substantive findings should be documented (where and/or how) and followed up as necessary. Relevant data should be made available for Bureau use, as appropriate.

### **10 FAM 236.7-2 Telephone Conversations**

*(TL:PEC-006; 03-28-2002)*

Each Program Officer should use telephone monitoring in accordance with the monitoring plan approved by the Office Director. Exclusive use of telephone monitoring may be appropriate for renewal projects or for projects that cannot readily be visited.

### **10 FAM 236.7-3 Site Visits**

*(TL:PEC-006; 03-28-2002)*

Site visits, where time and fiscal resources permit, may be particularly appropriate for complex or troublesome projects or projects with special significance. Site visiting, however, should not be used as a substitute for other ongoing forms of monitoring. Each program-monitoring guide should include guidelines for planning and conducting site visit, and for preparing follow-up reports. Prior to a site visit, the staff member to conduct the visit should discuss both the financial and programmatic concerns related to projects to be visited with the concerned program and grants officers.

### **10 FAM 236.7-4 Review of Reports**

*(TL:PEC-006; 03-28-2002)*

To ensure the timely review of reports, each program office should establish procedures for tracking deadlines for submission, dates of review, and follow-up actions.

## **10 FAM 236.7-5 Meetings with Program Participants**

*(TL:PEC-006; 03-28-2002)*

Local meetings where a number of program participants are in attendance, or meetings specifically for project directors and/or staff, provide an opportunity for monitoring. At these events, for example, staff members can make their program monitoring expectations clear, gather information on project needs and progress, and hold networking sessions where participants and other experts assist one another in better meeting program goals.

## **10 FAM 236.7-6 Correspondence**

*(TL:PEC-006; 03-28-2002)*

Correspondence, electronic or otherwise, may be used to obtain information, resolve problems, or to communicate program developments and goals.

## **10 FAM 236.7-7 Follow-up Procedures**

*(TL:PEC-006; 03-28-2002)*

a. All monitoring contacts should be documented and retained in the program office file. Significant findings (e.g., items requiring official action, problems requiring resolution) must be documented in a form or report that, at a minimum, identifies the project, person contacted, method of monitoring, and summarizes the findings, recommendations, and proposed follow-up actions, including deadlines and assignment of responsibilities.

b. All follow-up actions that cannot be resolved by the program office should be referred to the appropriate office for resolution. For example, if the program officer has been responsible for conducting the monitoring, any financial problems and issues of compliance requiring official action should be referred to the Grants Division or other offices, as appropriate. Requests for action must be made as soon as possible after making a determination of needed action. The program monitoring guidelines should explain procedures for referring and documenting such requests within Department offices.

c. Each program and grants administration office should establish procedures for tracking and follow-up actions pursuant to monitoring. Periodic checks should be made to ensure follow-up action is occurring on schedule.

# **10 FAM 237 GUIDELINES FOR MONITORING GENERAL GRANTS AND COOPERATIVE AGREEMENTS**

*(TL:PEC-006; 03-28-2002)*

The purpose of this section is to improve the quality of grant and cooperative agreement monitoring in the Bureau of Education and Cultural Affairs through the establishment of standards for monitoring. These standards provide a common framework for all offices to follow and represent minimum expectations. Staff are encouraged to exceed these standards whenever possible.

## **10 FAM 237.1 General Policy**

*(TL:PEC-006; 03-28-2002)*

The Bureau of Education and Cultural Affairs monitors the status and progress of grants and cooperative agreements and is to provide reasonable assurance that:

(1) Federal funds are expended in ways that meet the provisions of pertinent statutes, regulations, and administrative requirements; and

(2) Adequate progress is being made toward accomplishing the purpose of the grant or cooperative agreement.

## **10 FAM 237.2 Applicability**

*(TL:PEC-006; 03-28-2002)*

All offices, which administer grants for the Bureau, are subject to the terms of these guidelines. Exemption from any provision may be requested with justifications by the cognizant Division Chief and must be approved by the cognizant Office Director.

## **10 FAM 237.3 Activities**

### **10 FAM 237.3.1 Monitoring**

*(TL:PEC-006; 03-28-2002)*

a. Monitoring is the observation of, analysis of, or assistance to a grant or cooperative agreement organization to determine and improve:

(1) Compliance with statutes, regulations, and terms and conditions of award; and

(2) Quality and the accomplishment of stated goals and objectives of the grant.

b. A monitoring plan should be developed by each Office Director, which delineates how in a given fiscal year grants are to be monitored in accordance with the requirements set forth in this directive.

## **10 FAM 237.3-2 Authorization**

*(TL:PEC-006; 03-28-2002)*

Activities must be consistent with and authorized by the Fulbright-Hays Act and must comply with the Bureau of Education and Cultural Affairs' legislative charter. Grant and cooperative agreement instruments must comply with the requirements of the contracting officer, who is the sole official authorized to obligate the United States government in financial assistance awards.

## **10 FAM 237.3-3 Roles and Responsibilities**

*(TL:PEC-006; 03-28-2002)*

a. The roles and responsibilities of Office directors are to:

(1) Set guidelines for reviewing cooperative agreement monitoring guidelines;

(2) Approve grant and cooperative agreement monitoring guidelines [note role of staff, to avoid appearance that the Office directors (OD) does it all;

(3) Assure that monitoring functions are included in individual performance agreements, as appropriate;

(4) Identify resources to be used for monitoring; and

(5) Delineate monitoring responsibilities of managers and supervisors within the organization.

b. Managers, and Program Officers responsibilities are to:

(1) Develop grant and cooperative agreement monitoring plans;

(2) Develop appropriate and systematic monitoring approaches guidelines, and instruments;

(3) Monitor grants and cooperative agreements in accordance with approved monitoring plans and procedures, with assistance from the grants administration office on business and financial management matters;

(4) Advise grants officers and grantees on programmatic aspects of grants;

(5) Resolve problems or participate in the resolution of problems relating to grants;

(6) Establish internal procedures for tracking follow-up actions resulting from monitoring;

(7) Review all relevant reports (including acknowledgments to grantees and recommendations to the grants administration office);

(8) Review pertinent audit reports for monitoring implications in conjunction with the audit staff; and

(9) Share documents and information with grants officers.

c. The Grants Division Staff are responsible to:

(1) Assist in developing business management aspects of monitoring plans and monitoring guidelines

(2) Establish internal procedures for tracking follow-up actions resulting from monitoring;

(3) Maintain official grant files;

(4) Approve changes in negotiated scopes of work or budgets;

(5) Monitor financial or business management aspects of grants;

(6) Review and approve grantee fiscal reports;

(7) Close out grants (with program and finance offices);

(8) Review pertinent audit reports for monitoring implications;

(9) Share documents and information with project officers.

d. Inspector General, consistent with general responsibilities is responsible:

(1) To assure appropriate handling and resolution of allegations of fraud, waste, and mismanagement disclosed through monitoring; and

(2) To inform offices of audit schedules and findings to assist program offices and grants offices in developing annual monitoring plans.

e. Office of Legal Adviser, consistent with general responsibilities is responsible to:

(1) Provide assistance to offices, as necessary, concerning legal issues raised in grant monitoring guidelines, monitoring instruments, monitoring contacts, and monitoring findings; and

(2) Review for legal sufficiency and compliance with statutorily required procedures, grant guidelines and instruments that may interpret or apply statutes and regulations.

## **10 FAM 237.4 Purpose of Monitoring**

*(TL:PEC-006; 03-28-2002)*

a. The purpose of grant and/or cooperative agreement monitoring is to determine and improve compliance with statutes, regulations, and grant award terms and conditions; and project quality and progress in meeting its stated goals in accordance with the terms and conditions of the grant award.

b. More specifically, sufficient and systematic monitoring of grants is needed to make the following administrative determinations:

(1) Compliance of grantees with award conditions, grant regulations, and the authorizing legislation;

(2) Sufficiency of progress toward accomplishing stipulated and approved program goals;

(3) Relative quality and cost effectiveness of the management of projects and programs;

(4) Need for technical assistance to enhance project quality and compliance; and

(5) Identification and dissemination of exemplary results.

## **10 FAM 237.5 Timing and/or Planning of Monitoring**

### **10 FAM 237.5-1 Application Period**

*(TL:PEC-006; 03-28-2002)*

The period for monitoring spans the time from the day of the grant/cooperative agreement award until the end of the grant and/or contract period.

## **10 FAM 237.5-2 Monitoring Plan**

*(TL:PEC-006; 03-28-2002)*

Each program office is responsible for developing a plan for monitoring grants and/or cooperative agreements. The plan is designed to ensure that each program office develops monitoring activities that are consistent with statutory requirements and purposes. It must contain the following elements:

(1) A summary of the monitoring activities to be carried out based on anticipated resources. This summary should include an explanation of how monitoring priorities and methods were determined and an assurance that appropriate, available data on grants have been considered in formulating the plan (e.g., audit findings). The summary should provide information on the frequency, quantity, and purposes of monitoring methods being used;

(2) A report of the progress made by the grantee;

(3) An analysis of any particular problems or opportunities relative to outstanding grants and/or agreements that will require special attention and a description of relevant monitoring and assistance activities;

(4) An explanation of anticipated monitoring costs, including travel, equipment, and staffing; and

(5) A copy of any grant guidelines and instruments being used in the monitoring process.

## **10 FAM 237.6 Monitoring Approaches and Activities**

*(TL:PEC-006; 03-28-2002)*

All program offices should establish and maintain monitoring activities that are consistent with the statutory requirements and purposes of the authorizing legislation and the office's specific purposes. These activities must include, at a minimum, systematic and appropriate contact with grantees, clearly understood operational guidelines and procedures for Bureau staff, and, when appropriate, other activities that enhance the effectiveness of grantees' progress in meeting program goals.

### **10 FAM 237.6-1 Monitoring Methods**

*(TL:PEC-006; 03-28-2002)*

a. At least five methods can be used for monitoring:

(1) Telephone conversations with grantees;

(2) Site visits;

(3) Review of reports prepared by grantees: (Offices should ensure that all grants are subject to a reasonable level of monitoring, in light of resource constraints. At a minimum, all grantees must be monitored by review of written program reports prepared by all grantees each year. Complex or vulnerable grants, or projects with special significance, however, will require additional monitoring attention.);

(4) Meetings with grantees; and

(5) Correspondence (written or electronic).

b. Any substantive findings should be documented, followed-up as necessary, and data made available for Department use, as appropriate.

## **10 FAM 237.6-2 Criteria**

*(TL:PEC-006; 03-28-2002)*

Offices should ensure that all grants are subject to a reasonable level of monitoring, in light of resource constraints. At a minimum, all grantees must be monitored by telephone and review of reports prepared by grantee organizations each year. Complex or vulnerable grants, or projects with special significance, however, will require additional monitoring attention. Specific instructions related to these monitoring methods are outlined below.

## **10 FAM 237.6-3 Telephone Conversations**

*(TL:PEC-006; 03-28-2002)*

Each program officer should use telephone monitoring in accordance with the program office's approved annual monitoring plan. A log or other means should be used for internal tracking of the monitoring schedule. Guidelines or instruments should be used to ensure adequate coverage of topics. Exclusive use of telephone monitoring may be appropriate for renewal projects or for projects that cannot readily be visited, or when resources for other forms of monitoring are limited.

## **10 FAM 237.6-4 Site Visits**

*(TL:PEC-006; 03-28-2002)*

Site visits, where funds permit, may be particularly appropriate for complex or troublesome projects or projects with special significance. Site visiting, however, should not be used as a substitute for other ongoing forms of monitoring. Each program-monitoring manual should include guidelines for planning and conducting site visits, and for preparing follow-up reports. Prior to the visit, the project officer and grants officer should discuss both the financial and programmatic concerns related to projects to be visited.

## **10 FAM 237.6-5 Review of Reports**

*(TL:PEC-006; 03-28-2002)*

To ensure the timely review of reports, each program office and grants office should use or establish procedures for tracking deadlines for submission, dates for review, and follow-up actions.

(1) EX-IIP/EX/G (Grants Division) should send all grantee performance and evaluation reports to the program office within five days of receipt. The program office should review reports within 15 calendar days of receipt for any necessary follow-up action. A copy of the project officer's evaluation of the report should be sent to the Grants Division.

(2) Each financial status report should be reviewed by the responsible grants officer within 30 calendar days of receipt. Any action necessary as a result of such a review should be initiated within five workdays of the review.

(3) Written notice of unacceptable reports should be provided to grantees within 10 workdays of review. Grantees should be given specific guidance and a deadline for submitting either a revised report or the additional information needed.

(4) Meetings, where a number of grantees are in attendance, or meetings specifically for project directors and/or staff, provide an opportunity for monitoring. At these events, for example, Bureau staff members can make their monitoring expectations clear to grantees, gather information on project needs and progress, and hold networking sessions where grantees and other experts assist one another in better meeting program goals.

e. Correspondence may be used to obtain information, resolve problems, or to communicate program developments and goals.

## **10 FAM 237.6-6 Follow-up Procedures**

*(TL:PEC-006; 03-28-2002)*

a. All monitoring contacts should be documented with records maintained in the Program Office project file. Significant findings (e.g., items requiring official action, problems requiring resolution, site visit reports) must be documented in a form or report that, at a minimum, identifies the project, person contacted, method of monitoring, and summarizes the findings, recommendations, and proposed follow-up actions, including deadlines and assignment of responsibilities.

b. The documentation form or report on significant findings should be placed in the program office grant file. When a Bureau monitoring data

system is established, the documentation should also be entered into the system according to the guidelines provided.

c. All follow-up actions that cannot be resolved by the program office should be referred to the appropriate office for resolution. For example, if the program officer has been responsible for conducting the monitoring, any financial problems and issues of compliance requiring official action should be referred to the Grants Division or other offices, as appropriate. Requests for action must be made as soon as possible after making a determination of needed action. The program monitoring guidelines should explain procedures for referring and documenting such requests within Department offices.

d. Each program and grants administration office, as appropriate, should establish procedures for tracking any follow-up actions pursuant to monitoring. Periodic checks should be made to ensure follow-up action is occurring on schedule.

## **10 FAM 238 AND 239 UNASSIGNED**