

# INTERNET FOR ALL

## Consolidated Appropriations Act Grant Programs

*Frequently Asked Questions (FAQs)  
Monitoring Overview: Site Visits and Desk Reviews*



U.S. Department of Commerce

National Telecommunications and Information Administration

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## *Frequently Asked Questions (FAQs)*

### *Monitoring Overview: Site Visits and Desk Reviews*

*This resource is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the specific requirements set forth in program Notice of Funding Opportunities (NOFO), existing Department of Commerce (DOC) Grants and Cooperative Agreements Manual (Grants Manual) requirements, or other Departmental Administrative Orders (DAOs) and Federal Circulars. Similarly, this guidance document does not supersede or supplement NIST or NOAA GMD policies and procedures related to their work on financial assistance awards. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in this guidance.*

#### **Q: Are site visits and desk reviews required for all projects?**

A: Not all recipients will receive a site visit or a desk review. However, the National Telecommunication and Information Administration's (NTIA) Office of Internet Connectivity and Growth (OICG) will monitor all recipients through a combination of monitoring activities, which also includes conference calls. The assigned Federal Program Officer (FPO) will notify the grant recipient about the monitoring activities their project has been selected for and work with the grant recipient on the timing and details for the proposed activity.

Throughout the duration of the award, certain actions may result in a change of the type, frequency and/or intensity of the monitoring activities. NTIA retains the right to determine the number and cadence of site visits and/or desk reviews.

#### **Q: How often do site visits and desk reviews take place? Is there a standard length of time they take to facilitate?**

A: The frequency and duration of monitoring activities depends on many factors, such as the project's complexity, risk level and period of performance. NTIA will perform as many monitoring activities as necessary throughout the life of the award to ensure adequate oversight.

When selecting the appropriate monitoring activity type, FPOs consider various award complexities (such as significant purchases or multiple subawards) that may require more time-intensive monitoring activities. For example, a site visit that includes multiple project sites may take a few days to monitor, while an award with only one project area may only take one or two days. Desk reviews generally last for a few hours but may take longer depending on the complexity of the project and the volume of documents. Desk reviews can also happen over a series of calls depending on the progress of the project.

#### **Q: How much advance notice will grant recipients be given to prepare for the monitoring activity?**

A: NTIA FPOs will attempt to notify recipients at least 45 calendar days in advance of a site visit or desk review, but it may be less depending on circumstances. In most cases, grant recipients

will be notified well in advance with ample time to prepare documents and agendas, coordinate with key personnel, and prepare sites for monitoring activities.

**Q: What parameters do FPOs use to determine if grant recipients are on schedule with their projects during monitoring engagements?**

A: FPOs utilize an assortment of tools to track project progress. The grant application and Baseline Report help to set the foundation for expected project milestones. If periods of performance shifted, the FPO may use information provided during regular meetings, such as the percentage of budget expended, the number of days remaining in the period of performance, project objectives or official changes in scope and/or period of performance. The assigned FPO may request project plans to understand the project timelines better.

Communication between grant recipients and their assigned FPO will help determine if the project is on track with the anticipated project timeline.

**Q: If a grant recipient revises their project, when should the recipient communicate with their FPO about the changed project activities?**

A: Per [2 CFR § 200.308](#), grant recipients must formally request changes for deviations in their project to the assigned FPO. Grant recipients should work with their assigned FPO for guidance on whether proposed changes require an Award Action Request (AAR) and how to document those changes before implementing the changes to the project.

NTIA recommends discussing any changes to the approved project plan or budget with the assigned FPO before implementing changes to the project. After speaking with the assigned FPO and determining that the project changes require an AAR, grant recipients will need to submit a formal Change of Scope and/or Budget Modification AAR/Revision Request (RR).

**Q: What can grant recipients do to prepare for site visits and desk reviews?**

A: Grant recipients should compile documentation that supports expenditures and project milestones, demonstrating that Federal funds were appropriately spent on the execution of the obligated scope of work.

During the preparation phase of the monitoring process, FPOs will request a series of documents to be delivered to and reviewed by the FPO in advance of the monitoring activity. Grant recipients can ensure a smooth monitoring activity by beginning to compile all relevant documents related to the obligated scope of work including: policy and process manuals, organizational charts, payroll information for personnel funded by the grant, procurement documents, executed contracts and change orders, purchase orders, invoices, canceled checks, Automated Clearinghouse (ACH) transfers, etc.

**Q: When will grant recipients know what documents they need to produce for their monitoring activity?**

A: Grant recipients will receive a document checklist in advance of a site visit or desk review. The target timeline for sending these checklists is 45 calendar days prior to the monitoring activity. NTIA OICG encourages grant recipients to properly store all documents, so they are easily accessible well in advance of notification of monitoring activities. Doing so will also assist grant recipients with maintenance and retention of documents.

**Q: What should grant recipients do if they cannot provide documents requested by the FPO?**

A: Grant recipients are encouraged to retain all documentation that would be required to demonstrate that they expended Federal funds appropriately. If a grant recipient is not able to provide the requested documents, they should provide alternative documents that can help their FPO answer any questions related to oversight. For example, the FPO may request cleared checks to confirm that the grant recipient expended funds on allowable activities. If the grant recipient is not able to provide cleared checks, ACH transfers may suffice to demonstrate the amount of money expended on the activity.

As a best practice, grant recipients should provide their FPO with what is requested. If a grant recipient has other unrequested documents that answer the FPO's question, they can provide those instead of or in addition to the requested documents.

If the FPO requests documents that are irrelevant to the execution of the project's obligated scope of work, then the grant recipient should inform their FPO that the document request does not apply to the project. For example, the FPO may request documents related to construction, like as-builts. If the obligated scope of work contains no construction elements, then the grant recipients should inform their FPO. Grant recipients are always encouraged to reach out to their FPO if they have any questions regarding their request for documentation.

**Q: What kind of documents do FPOs need to see about how grant recipients monitor subrecipients?**

A: Grant recipients are responsible for assessment and oversight of subrecipients, including reviewing their financial and performance reports. NTIA OICG requires that grant recipients clearly identify subawards and impose specific subaward conditions. In order to determine the appropriate subrecipient monitoring conditions, grant recipients must evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations and the terms and conditions of the subaward (see [2 CFR § 200.332\(d\)](#)). Oversight of subrecipient activities ensures that Federal funds are spent appropriately. During a monitoring activity, the FPO may request to see subrecipient documentation, such as monitoring plans and risk assessments. Ideally, the subrecipient will also be present at the monitoring activity to answer any further questions.

**Q: Will invoices and reports from subrecipients need to be provided by grant recipients in advance of the monitoring activity?**

A: Because monitoring aims to ensure appropriate usage and expenditure of Federal funds, invoices from subrecipients may be among the documents reviewed by NTIA OICG during the monitoring activity as an extension of the subrecipient monitoring requirement (see [2 CFR § 200.331](#)). If the review of subrecipient invoices is a requirement of the desk review or site visit, then the assigned FPO will include the required documentation in the document checklist and monitoring activity agenda.

If the reports provided by the subrecipient help track project milestones, it may be helpful for grant recipients to review subrecipient reports with their assigned FPO during a monitoring activity or a regularly scheduled call.

**Q: What kind of documents do FPOs need to see regarding contractors?**

A: NTIA OICG does not specify how grant recipients should monitor their contractors (see [2 CFR § 200.331 for guidance on the difference between subrecipients and contractors](#)).

It is the grant recipients' responsibility to ensure that the procurement, receipt and payments for goods and services comply with Federal statutes, applicable regulations and the terms and conditions of the award. The assigned FPO may request to see contractor or procurement documents such as contracts, invoices, inventory management logs and signed agreements. It is important that grant recipients have these documents ready before the monitoring activity, as contractors are not expected to be in attendance during the site visit and/or desk review.

**Q: Do subrecipients need their invoices certified per [2 CFR § 200.415](#)?**

A: Subrecipient invoices do not need a certification. During monitoring activities, grant recipients may be asked to present subrecipient invoices and contracts to show that the grant recipient and/or the subrecipient are following the Uniform Administrative Requirements ([2 CFR Part 200](#)).

**Q: For grant recipients whose subrecipients are conducting most of the obligated work, should subrecipient representatives be present during the monitoring engagement?**

A: It is recommended, although not required, that subrecipient representatives are available during the monitoring activity if they are responsible for the work related to the activity. However, the responsibility to monitor subrecipients rests with the grant recipient ([see 2 CFR 200.332\(d\)](#)). When coordinating the agenda for the monitoring activity, the grant recipient's assigned FPO will discuss required attendees with them. Grant recipients should utilize the tools and methods demonstrated in [this Post-Award Webinar presentation on Site Visits & Desk Reviews](#) to aid with the monitoring of their subrecipients.

**Q: What if the project sites selected for a site visit are not accessible?**

A: During the preparation phase, the grant recipient's assigned FPO will send the grant recipient a draft agenda to assist with determining whether a project site will be accessible during the site visit. NTIA OICG's objective is to view project sites that are complete or close to completion to ensure that the work was conducted according to the terms of the award. If project sites are inaccessible, the FPO will confer with Program Leadership to determine next steps, which may include a request for photographs or videos rather than visiting the actual project sites.

**Q: Will grant recipients whose projects are primarily for broadband use and adoption activities be selected for a site visit?**

A: All grant projects are subject to monitoring activities, including site visits and desk reviews. Determination of the type of monitoring activity depends on multiple factors, including project complexity, risk level and period of performance. While broadband use and adoption projects and planning projects tend to have fewer complexities than infrastructure projects, it is not a guarantee that these projects will not receive a site visit or a desk review.

**Q: How will NTIA monitor recipient compliance with the Davis-Bacon and Related Acts and Reorganization Plan?**

A: Documentation related to [Davis-Bacon and Related Acts and Reorganization Plan](#) may be a part of validating project expenditures. If Davis-Bacon compliance is a requirement of the grant program, then the assigned FPO will include the required documentation in the document checklist and monitoring activity agenda. Grant recipients will be sent these items before the site visit and/or desk review so that they may prepare necessary information ahead of time.

The program NOFO and assigned FPO will have details about Davis-Bacon compliance if it is a requirement of the specific grant program.