

# Oklahoma Employment Security Commission



Jon Brock, Executive Director

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**Representing Employers**

George Ollie, Jr., Commissioner  
Ted Weber, Commissioner

**Representing the Public**

Rev. W. B. Parker, Chairman

**Representing Employers**

David Hill, Commissioner  
DeWayne Goodman, Commissioner

## Oklahoma Employment & Training Issuance 06-2005

**Date:** April 4, 2005  
**To:** WIA Grant Recipients  
**From:** Employment and Training Division  
**Subject:** Grant Review Policy

**Purpose:** To announce that the pre-award financial review or on-site post-award monitoring requirement is changed from 30 to 120 days after the award of a contract.

**Background:** In order to comply with OIG recommendations, OESC employs a grant review system to identify grantees that may have a higher risk of potential deficiencies. This includes the awarding of a grant to a recipient that has little or no prior workforce program experience. In these situations, OESC either performs a pre-award financial review or conducts an on-site monitoring of the grantee.

When such a grantee is identified, the following process is conducted to ensure the grantee is capable of effectively administering the grant and can adhere to the requirements of all Federal, State and local guidelines.

OESC Employment and Training staff makes this determination through either a pre-award review or a post award monitoring session based on the following:

- Is proper documentation available to verify that the grantee is financially solvent?
- Does the grantee maintain an adequate financial management system in accordance with 29 CFR 95 and 29 CFR 97.
- Is there a current cost allocation plan that meets the requirements of the OMB circulars?

**Message:** OESC grant recipients must also implement a similar system to effectively and timely review higher risk subrecipients including all new subrecipients. This review must be conducted prior to the award or within 120 days after the contract has been awarded. OESC monitoring teams will verify that these policies are in place during the annual monitoring review or as needed - based on evidence of a potential issue.

**Action Required:** This issuance is to become a part of your permanent records.

**Rescissions:** OETI #03-2003