



ADN-to-BSN Completion Program

Reporting and Monitoring Webinar

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Compliance Overview

ADN to BSN Completion Grant Program

- 1. PMO Compliance Team Introduction**
- 2. Risk Based Compliance Management Approach & Requirements**
- 3. Summary of Monitoring Activities**
- 4. Testable Attributes**
- 5. Questions & Contact Information**

Our Integrated Team



Compliance Team Background

Since 2020, the COVID-19 PMO Compliance Team (also referred to as “Team Guidehouse”, which includes the firms Guidehouse, Pierce, Monroe & Associates, and Rehmann) has conducted **compliance monitoring of State programs that use federal COVID-19 stimulus funding**, on behalf of the State’s COVID-19 Office of Accountability / PMO.

Risk Based Compliance Management Approach

What Is Monitoring

- Process of ensuring that state-level programs backed by federal pandemic stimulus funding **operate in compliance with federal guidance**
- Concurrent vs. conclusive process (i.e., end of spending review)
- Executed by ensuring **programs are designed for compliance** throughout and by verifying both recipients of federal funds and charges to federal awards are allowable

Why We Monitor

- The Uniform Guidance for Federal Awards (2 CFR 200) **outlines requirements for federal awards, including monitoring requirements**
- 2 CFR 200.203: State must monitor to provide **“reasonable assurance”** that federal funding **abides by the “terms and conditions of the federal award”**
- Monitoring helps the State detect and address noncompliance **prior to State Single Audit or other audits**

Specific Requirements

- Determining allowability of costs charged to a federal award
- Adherence to reporting requirements established by federal and state statute/regulation
- Establishing and maintaining a financial management system supported by robust internal controls
- Utilizing funds in a way that prevents duplication of benefits
- Obtaining a Single Audit if more than \$750K was expended in a fiscal year

Key Takeaways



The team is minimizing compliance-related issues by conducting a concurrent monitoring model for this program. Monitoring will occur on a quarterly basis.



The team addresses compliance-related trends and issues observed throughout the concurrent monitoring process and works with 60x30 and its subrecipients to implement corrective action, if required.

Summary of Monitoring Activities

Subrecipient Selection

- The Compliance Team works in concert with 60x30 to select community colleges in an active spend/reimbursement status (no less than 5% of subrecipient population will be selected during each instance of monitoring)
- 60x30 emails selected community colleges and introduces compliance team
- Compliance team works directly with community colleges during monitoring

Request Sequence

- The Compliance Team begins with an initial request for the community college's general ledger detail (transactions that equal total expenditures to date, preferably in excel format) **and** the organization's financial policies and procedures that outline grants management of federal funds
- Following general ledger and organizational policy review, the compliance team will randomly select specific line items for transaction testing. The entire selection will capture all expense categories (e.g., payroll, non-payroll, indirect costs, etc.) to ensure the sample is representative of the whole
- All documentation will be shared via a secure ShareFile portal; the link to the portal will be included in all documentation requests

Corrective Action / Closeout

- Once all documentation has been reviewed and substantiated, the Compliance Team will inform all subrecipients once an instance of monitoring is complete via a "closeout email"
- If corrective action is necessary, the Compliance Team will work directly with community colleges to implement a corrective action plan



Attributes We're Testing

Community College Eligibility Attribute	Supporting Documentation
Planned for the design, delivery, and maintenance of an ADN to BSN program	Signed grant/articulation agreement
Utilized existing ADN to BSN programs	
BSN completion courses taught (at least partially) in person on the Community College campus	
Commitment to joint faculty appointments for qualified Community College faculty	
Establishment of a co-branding model with BSN-granting institution	
Presence of comprehensive student support (e.g., financial aid, career services, academic advising)	
5-year agreement duration with BSN-granting institution	
Received strategic input/engagement from local healthcare employers/workforce development agencies	Correspondence, meeting minutes, or similar medium illustrating strategic input/engagement

Attributes We're Testing, Continued

Student Eligibility Attribute	Supporting Documentation
<p>Completed an Associate Degree in Nursing OR ADN-seeking students (with expressed intent to pursue the BSN program) deemed eligible from 60x30</p>	<p>Academic Records from Community Colleges</p>
<p>Enrollment in eligible Community College/4-year Institution BSN program</p>	
Financial Aid Accuracy Attribute	
<p>Student Financial Aid amounts for students aligned to this program do not exceed full cost of attendance</p>	<p>Individual Community College/4-Year University Financial Aid Policies/Procedures</p> <p>Individual student financial aid package from the Community College</p>
<p>Accurate disbursement of funds</p>	
Validating Suspension and Debarment	
<p>Community Colleges, their partners, and students are not suspended or debarred</p>	<p>Documented processes that ensure every subrecipient and contractor is not suspended or debarred</p>
Financial Execution Attribute	
<p>Financial Management of the Program (Transactions other than Financial Aid)</p>	<p>Substantiating general ledger transactions against payroll registers, invoices, and similar documentation</p>



Reporting Template



Important Dates

- April 10: quarterly reporting due
- Office hours (through April 12):
 - Tuesdays from 2:00 to 3:00
 - Fridays from 11:00 to 12:00

Questions?



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